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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

JANE DOE, an Individual Woman,

Plaintiff,

vs.

CALVIN BROADUS AKA “SNOOP
DOGG”, individually; DONALD
CAMPBELL AKA “BISHOP DON
MAGIC JUAN”, individually; SNOOP
DOGG’S, LLC; THE BROADUS
COLLECTION, LLC; CASA VERDE
CAPITAL, LLC; and MERRY JANE
EVENTS, INC.;

Defendants.

Case No. 2:22-cv-00900

**FIRST AMENDED COMPLAINT FOR
MONETARY AND PUNITIVE
DAMAGES**

1. Trafficking Victims Protection Act 18 U.S. Code § 1591;
2. Sexual Battery;
3. Sexual Assault;
4. Retaliation Under Title VII;
5. Retaliation in Violation of the FEHA [Cal. Gov’t Code §§12940(h)];
6. Harassment in Violation of the FEHA [Cal. Gov’t Code §12940(j)];
7. Aiding And Abetting In Violation Of Gov’T Code §§ 12940 Et Seq.;
8. Failure To Prevent Harassment and Retaliation In Violation of FEHA [Cal. Gov’t Code §12940(k)];
9. Defamation;
10. False Light;
11. Intentional Infliction of Emotional Distress;
12. Negligent Infliction of Emotional Distress; and

13. Unlawful Retaliation In Violation Of
California Labor Code § 1102.5

DEMAND FOR JURY TRIAL

Plaintiff, Jane Doe, by and through her attorneys, Derek Smith Law Group, LLP, hereby complains of Defendants CALVIN BROADUS AKA “SNOOP DOGG”, individually; DONALD CAMPBELL AKA “BISHOP DON MAGIC JUAN”, individually; SNOOP DOGG’S, LLC; THE BROADUS COLLECTION, LLC; CASA VERDE CAPITAL, LLC; and MERRY JANE EVENTS, INC. upon information and belief, as follows:

NATURE OF THE CASE

1. Plaintiff brings this action charging Defendants violated Plaintiff’s rights pursuant to, inter alia, Trafficking Victims Protection Act 18 U.S. Code § 1591, and laws of the State of California, based upon the supplemental jurisdiction of this Court pursuant to *United Mine Workers of America v. Gibbs*, 383 U.S. 715 (1966) and 28 U.S.C. §1367, seeking damages to redress the injuries Plaintiff suffered as a result of being sexually assaulted, battered, retaliated against, harassed, and defamed.

JURISDICTION AND VENUE

2. Jurisdiction of this action is conferred upon this Court as this case involves a Federal Question under 18 U.S. Code § 1591. The Court also has

1 jurisdiction pursuant to 29 U.S.C. §2617; 28 U.S.C. §1331, §1343 and pendent
2 jurisdiction thereto.

3
4 3. Additionally, 28 U.S.C. §1331 states that “The district courts shall have
5 original jurisdiction of all civil actions arising under the Constitution, laws, or treaties
6 of the United States.”

7
8 4. This Court has supplemental jurisdiction over the related state law and
9 local ordinance claims pursuant to 28 U.S.C. § 1367(a) because Plaintiff’s claims
10 under California law form part of the same case or controversy under Article III of the
11 United States Constitution. Plaintiff’s state law claims share all common operative
12 facts with Plaintiff’s federal law claims, and the parties are identical.

13
14 5. Pursuant to 28 U.S.C. § 1391(b), venue is proper in the Central District
15 of California because as described further herein, a substantial part of the events or
16 omissions giving rise to the claims herein occurred in Los Angeles County, State of
17 California and within the Judicial District for the Central District of California.
18 Moreover, Plaintiff resides in this District, and DEFENDANTS operate their business
19 in this District.

20
21 6. Accordingly, this action properly lies in the Central District of California
22 pursuant to 28 U.S.C. 1391.

7. Around March 10, 2022, Plaintiff received a Right to Sue Letter from the California Department of Fair Employment and Housing and filed a Charge of Discrimination with the Equal Employment Opportunity Commission.

8. Defendants are subject to suit under the California Fair Employment and Housing Act (“FEHA”) as they regularly employ five or more persons in the State of California. [Gov’t Code § 12926(d).] FEHA prohibits harassment and retaliation on the basis of race, sex, color, national origin, ancestry and age, among other acts, by an employer against employees and applicants.

THE PARTIES

9. At all times relevant for purposes of this Complaint, Plaintiff, JANE DOE (“Plaintiff”) has been a resident of the State of California.

10. Plaintiff is a sexual assault victim and is identified herein as JANE DOE. Please see *Doe v. Blue Cross & Blue Shield United of Wisc.*, 112 F.3d 869, 872 (7th Cir.1997) (“fictitious names are allowed when necessary to protect the privacy of ... rape victims, and other particularly vulnerable parties or witnesses”). Additionally, “the public generally has a strong interest in protecting the identities of sexual assault victims so that other victims will not be deterred from reporting such crimes.” *Doe No. 2 v. Kolko*, 242 F.R.D. 193, 195 (E.D.N.Y.2006); see also *Doe v. Evans*, 202

1 F.R.D. 173, 176 (E.D.Pa.2001) (granting anonymity to sexual assault victim). Doe v
2 Penzato, CV10-5154 MEJ, 2011 WL 1833007, at *3 [ND Cal May 13, 2011]

3
4 11. At all times material, Defendant SNOOP DOGG’S LLC (“SNOOP”) was
5 and is a corporation doing business in the State of California, with their principal
6 place of business located at 1880 Century Park East #200, Los Angeles, CA 90067.
7
8 Defendant SNOOP held supervisory authority over Plaintiff, controlling various
9 tangible aspects of Plaintiff’s employment, including the ability to hire and fire
10 Plaintiff.

11
12 12. At all times material, Defendant THE BROADUS COLLECTION, LLC
13 (“COLLECTION”) was and is a corporation doing business in the State of California,
14 with their principal place of business located at 1880 Century Park East #200, Los
15 Angeles, CA 90067. Defendant COLLECTION held supervisory authority over
16 Plaintiff, controlling various tangible aspects of Plaintiff’s employment, including the
17 ability to hire and fire Plaintiff.

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19
20 13. At all times material, Defendant CASA VERDE CAPITAL, LLC
21 (“CAPITAL”) was and is a corporation doing business in the State of California, with
22 their principal place of business located at 750 N San Vicente Blvd. #800, West
23 Hollywood, CA 90069. Defendant CAPITAL held supervisory authority over
24 Plaintiff, controlling various tangible aspects of Plaintiff’s employment, including the
25 ability to hire and fire Plaintiff.
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1 14. At all times material, Defendant MERRY JANE EVENTS, INC.
2 (“EVENTS”) was and is a corporation doing business in the State of California, with
3 their principal place of business located at 2058 N Mills Ave #441, Claremont, CA
4 91711. Defendant EVENTS held supervisory authority over Plaintiff, controlling
5 various tangible aspects of Plaintiff’s employment, including the ability to hire and
6 fire Plaintiff.
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9 15. At all times material, Defendant CALVIN BROADUS AKA “SNOOP
10 DOGG” (“SNOOP DOGG”) was and is the Owner of Defendants SNOOP,
11 COLLECTION, CAPITAL, and EVENTS. Defendant SNOOP DOGG held
12 supervisory authority over Plaintiff, controlling various tangible aspects of Plaintiff’s
13 employment including the ability to hire and fire Plaintiff.
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16 16. At all times material, Defendant DONALD CAMPBELL AKA
17 “BISHOP DON MAGIC JUAN” (“CAMPBELL”) was and is the Spiritual Advisor,
18 employee, agent, representative, and servant for Defendants SNOOP DOGG, SNOOP
19 DOGG’S LLC; THE BROADUS COLLECTION, LLC; CASA VERDE CAPITAL,
20 LLC; and MERRY JANE EVENTS, INC.
21

22 17. Defendants SNOOP DOGG’S LLC; THE BROADUS COLLECTION,
23 LLC; CASA VERDE CAPITAL, LLC; and MERRY JANE EVENTS, INC. are an
24 “employer” as defined by California *Government Code Sections* 12926(d), 12940(a),
25 12940(h) and 12940(j)(4)(A).
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1 18. Each DEFENDANT sued in this action acts and acted, in all respects
2 pertinent to this action, as the agent of the other DEFENDANTS, carried out a joint
3 scheme, business plan or policy in all respects pertinent hereto, and that the acts of
4 each DEFENDANT are legally attributable to the other DEFENDANTS
5

6 19. Under California law, Defendants are jointly and severally liable as
7 employers for the violations alleged herein because they have each exercised
8 sufficient control over Plaintiff. Each Defendant had the power to hire and fire
9 Plaintiff, supervise and control Plaintiff's work schedule and/or conditions of
10 employment, determine Plaintiff's rate of pay, and maintain Plaintiff's employment
11 records. Defendants suffer or permit Plaintiff to work and/or "engage" Plaintiff so as
12 to create a common law employment relationship. As joint employers of Plaintiff,
13 Defendants are jointly and severally liable for all relief available to Plaintiff under the
14 law.
15

16 20. At all times material, Plaintiff was and is a female residing in the State of
17 California.
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19 21. Defendants were Plaintiff's joint employers and/or prospective
20 employers.
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FACTS COMMON TO ALL CAUSES OF ACTION

22. At all times material, Plaintiff was and is a female residing in the State of California.

23. Throughout Plaintiff's career, Plaintiff has worked as a professional dancer, model, actress, host, and spokesmodel for Muse Ink Festival, Comedy Central, and CNN.

24. For several years, Plaintiff worked for, was employed by, and performed with Defendant SNOOP DOGG; SNOOP DOGG'S LLC; THE BROADUS COLLECTION, LLC; CASA VERDE CAPITAL, LLC; MERRY JANE EVENTS, INC.; Defendant CAMPBELL, and other rappers who toured with Defendant SNOOP DOGG, such as Weston Frye, Lil' Nate Dogg, Kurrupt, Sugar Free, and Warren G.

25. During these performances, Plaintiff worked for Defendant SNOOP DOGG and Defendant SNOOP DOGG's companies: Defendants SNOOP DOGG'S LLC; THE BROADUS COLLECTION, LLC; CASA VERDE CAPITAL, LLC; and MERRY JANE EVENTS, INC.

26. Defendants SNOOP DOGG, SNOOP DOGG'S LLC; THE BROADUS COLLECTION, LLC; CASA VERDE CAPITAL, LLC; MERRY JANE EVENTS, INC., and CAMPBELL employed Plaintiff as a dancer on stage as part of their concerts and shows.

1 27. Defendant SNOOP DOGG is the owner, agent, officer, and proxy for
2 Defendants SNOOP DOGG’S LLC, THE BROADUS COLLECTION, LLC, CASA
3 VERDE CAPITAL, LLC, and MERRY JANE EVENTS, INC.
4

5 28. Plaintiff obtained exposure as a Dancer for Defendants, which allowed
6 Plaintiff to obtain sponsorships, modeling jobs, and event hosting. Many of these
7 sponsorships and modeling jobs were also distributed nationwide.
8

9 29. Defendants SNOOP DOGG, SNOOP DOGG’S LLC; THE BROADUS
10 COLLECTION, LLC; CASA VERDE CAPITAL, LLC; MERRY JANE EVENTS,
11 INC., and CAMPBELL knowingly compensated Plaintiff through sponsorships,
12 modeling jobs, event hosting, and future business with Defendants when they hired
13 and/or allowed Plaintiff to perform at their shows and concerts.
14

15 30. Defendant CAMPBELL, an agent, employee, and proxy for Defendants
16 SNOOP DOGG, SNOOP DOGG’S LLC, THE BROADUS COLLECTION, LLC,
17 CASA VERDE CAPITAL, LLC, and MERRY JANE EVENTS, INC. would tell
18 Plaintiff, “*Snoop wants you here*,” “*This will make you go viral*,” and “*This is for*
19 *your career*.” By doing this, Defendant CAMPBELL demonstrated that Plaintiff will
20 be compensated for her work with Defendants and that she will be working for
21 Defendants at shows and concerts which Defendants profited from.
22

23 31. Defendant CAMPBELL, as an agent for Defendants and with Defendants
24 SNOOP DOGG, SNOOP DOGG’S LLC; THE BROADUS COLLECTION, LLC;
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1 CASA VERDE CAPITAL, LLC; and MERRY JANE EVENTS, INC.’s knowledge
2 and approval, engaged in a common scheme of recruiting, enticing, and harboring
3 Plaintiff, and individuals similarly situated to Plaintiff, with the intent for Plaintiff to
4 engage in sexual activities with Defendants SNOOP DOGG and CAMPBELL, in
5 exchange for access to employment with Defendants, which included, but are not
6 limited to, being a dancer at Defendants shows, promoting Defendants shows, hosting
7 Defendants shows, and appearing on Defendants shows such as “*GGN: Snoop Dogg’s*
8 *Double G News Network*.”

11
12 32. At all times material, Defendants SNOOP DOGG’S LLC, THE
13 BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY
14 JANE EVENTS, INC. produced, hired for, operated, and organized Defendant
15 SNOOP DOGG’s and other artists, including Defendant CAMPBELL’s, concerts,
16 shows, performances, and videos that were distributed nationwide.

18
19 33. In addition to this, Plaintiff received gifts from Defendant SNOOP
20 DOGG, CAMPBELL, other rappers, and sponsors in exchange for performing on
21 stage and dancing with them at their shows.

I. Defendant SNOOP DOGG’s History of Sexual Abuse, Harassment, Threatening of Females, and Retaliation and Unconscionable Acts that Deterred and Estopped Plaintiff from Filing Earlier

34. Defendant SNOOP DOGG has a long history of sexually abusing women, retaliating against and threatening them when they complain, and terminating employees who object to his unlawful conduct.

35. This history demonstrates a continuous pattern of sexual abuse, reckless indifference for the rights of others, and retaliatory threats and conduct when others object to unlawful conduct. This information further supports punitive damages and is admissible under F.R.E. 415. It also demonstrates that in keeping with SNOOP DOGG’s pattern of conduct, he is likely to retaliate against and possibly harm Plaintiff JANE DOE for her opposition to his sexual assault. This is another reason for Plaintiff’s anonymity. Furthermore, to the extent SNOOP DOGG takes any retaliatory action against Plaintiff JANE DOE, Plaintiff hereby claims retaliation for exercising her rights as stated herein. It is anticipated that SNOOP DOGG will sue Plaintiff JANE DOE for extortion just as he did to Kylie Bell in an effort to intimidate her. Plaintiff claims unlawful retaliation in the event of such lawsuit.

36. Defendant SNOOP DOGG refers to himself as a “Pimp.” In an interview with *Rolling Stone*, Defendant SNOOP DOGG said that in 2003, “***I put an organization together. I did a Playboy tour, and I had a bus follow me with ten***

1 *bitches on it. I could fire a bitch, fuck a bitch, get a new ho: it was my program.*
2 *City to city, titty to titty, hotel room to hotel room, athlete to athlete, entertainer to*
3 *entertainer...I get a couple of their players to come hang out, pick and choose, and*
4 *whichever one you like comes with a number. A lot of athletes bought puss from*
5 *me...I dreamed of being a pimp.”*
6

7
8 37. Around January 28, 2005, a Emmy winning makeup artist named Kylie
9 Bell stated in a filed lawsuit against Defendant SNOOP DOGG that on January 31,
10 2003, “she had been drugged,” and that “[Defendant SNOOP DOGG] raped Bell in
11 violation of Penal Code section 261.” Bell was told not to tell police because
12 “[Defendant SNOOP DOGG] **was a gang member and that he would send**
13 **someone to kill her if she reported the incident to the police.”**
14

15
16 38. Around December 10, 2004, in an attempt to further intimidate and
17 prevent Ms. Bell from filing a lawsuit against Defendant SNOOP DOGG for rape,
18 Defendant SNOOP DOGG filed his own retaliatory preemptive lawsuit against Ms.
19 Bell for extortion.
20

21 39. Around January of 2014, three of Defendant SNOOP DOGG’s
22 bodyguards complained that they were not being paid for overtime in violation of
23 California labor code. Defendant SNOOP DOGG terminated them in retaliation for
24 their complaints.
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1 40. Defendant SNOOP DOGG's threatened female rapper, Iggy Azalea, by
2 saying, "*Now I said what I said bitch now let it go before I go all in on ya pink punk*
3 *ass yeah u bitch!!*," and "*Say Bitch. You're fucking with the wrong n**ga! And*
4 *your n**ga betta check you before I do. You fucking bitch. Yeah, you fucking*
5 *cunt.*"

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7
8 41. Around May 18, 2018, during an interview on the Radio Show, *The*
9 *Breakfast Club Power 105.1*, Defendant SNOOP DOGG was asked, "Do you look
10 back at some of your old lyrics given the climate of what is happening today with
11 women's empowerment, and be like 'damn that is kind of fucked up that I said that?'"
12 Defendant SNOOP DOGG responded, "*Nope. Nope. Hell No. That was me. Fuck*
13 *them hoes. Straight up. Fuck a Bitch...I'm just saying that's me back then. At the*
14 *time I was making that music. That's who [Defendant SNOOP DOGG] was. I*
15 *cannot change that.*"

16
17
18 42. Around February of 2020, after an interview in which female CBS News
19 Anchor, Gayle King, discussed the sexual allegations against Kobe Bryant, Defendant
20 SNOOP DOGG threatened Ms. King's safety by saying, "*I wanna call you*
21 *one...Funky, dog-haired bitch, how dare you try and tarnish my motherfucking*
22 *homeboy's reputation, punk motherfucker...Respect the family and back off bitch,*
23 *before we come get you.*"

1 43. In response to the allegations made against Bill Cosby for rape, drug-
2 facilitated sexual assault, sexual battery, and child sexual assault spanning over
3 decades, Defendant SNOOP DOGG posted a picture on his Instagram account in
4 which he said, “*Free bill Cosby.*”

5
6 44. Throughout Defendant SNOOP DOGG’s career, he opened his concerts
7 by saying, “*Girls. Do you want me to make you famous? Then get down on both*
8 *knees, bitch.*”

9
10 45. As can be seen from the above, Defendant SNOOP DOGG engages in a
11 pattern and practice of sexually assaulting women, threatening women, and retaliating
12 against those who oppose unlawful behavior.

13
14 46. The following public background on Defendant SNOOP DOGG is
15 further evidence on why Plaintiff should be allowed to proceed as a JANE DOE. The
16 following public background is also relevant as to why Plaintiff did not fight
17 Defendant SNOOP DOGG when he sexually assaulted her. It is also relevant to
18 Plaintiff’s claim of estoppel with regard to certain Statutes of Limitations out of fear
19 of coming forward. Plaintiff claims estoppel with regard to certain Statutes of
20 Limitations in light of unconscionable acts that deterred her from filing claims as
21 required to state theory of estoppel. Bianco v Warner, 221CV03677FLAMARX, 2021
22 WL 4840470 [CD Cal Oct. 7, 2021]
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1 47. Lastly, it is evidence of Defendant SNOOP DOGG's reckless disregard
2 for others and going to his credibility:

- 3 • Defendant Snoop Dogg was arrested and charged with the murder of a
4 member of a rival gang who was allegedly shot and killed by Snoop
5 Dogg's bodyguard. Defendant Snoop Dogg was purportedly driving the
6 vehicle from which the gun was fired.
- 7 • In July 1993, Defendant Snoop Dogg was stopped for a traffic violation
8 and a firearm was found by police during a search of his car.
- 9 • In February 1997, Defendant Snoop Dogg pleaded guilty to possession of
10 a handgun.
- 11 • Defendant Snoop Dogg was arrested in October 2006 at Bob Hope
12 Airport in Burbank after being stopped for a traffic infraction. He was
13 arrested for possession of a firearm and for suspicion of transporting an
14 unspecified amount of marijuana, according to a police statement.
- 15 • The following month, after taping an appearance on *The Tonight Show*
16 with Jay Leno, he was arrested again for possession of marijuana, cocaine
17 and a firearm. Two members of Snoop's entourage, according to the
18 Burbank police statement, were admitted members of the Rollin 20's
19 Crips gang, and were arrested on separate charges.

- 1 • In April 2007, he was given a three-year suspended sentence, five years'
2 probation, and 800 hours of community service after pleading no
3 contest to two felony charges of drug and gun possession by a convicted
4 felon.
5
- 6 • On April 26, 2006, Snoop Dogg and members of his entourage were
7 arrested after being turned away from British Airways' first class lounge
8 at Heathrow Airport in London, England. Snoop and his party were
9 denied entry to the lounge due to some members flying in economy class.
10 After being escorted outside, the group got in a fight with the police and
11 vandalized a duty-free shop. Seven police officers were injured during
12 the incident.
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16 **II. Defendants Sexual Assault and Battery of Plaintiff**

17 48. Around May 29, 2013, during the time period that Plaintiff was a dancer,
18 model, and performer for Defendants, Plaintiff JANE DOE and her friend attended
19 one of Defendant SNOOP DOGG's shows at Club Heat Ultra Lounge, a night club in
20 Anaheim, CA. While at the show Plaintiff and her friend entered the VIP room where
21 they ran into Defendant CAMPBELL.
22

23 49. By way of background, Defendant CAMPBELL is a former "Pimp" and
24 creates fear in women. Defendant CAMPBELL, referred to the "girls" who "worked"
25 for him that "got out of line," by stating, "***You have to create fear in that female.***"
26
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1 *You have to tell her that if she do something wrong that you going to kill her. And*
2 *you have to instill this into her to when she do something wrong, and you whooping*
3 *her and checking her, that she says to you, ‘Daddy, Please don’t kill me like you*
4 *said you was.’* Defendant CAMPBELL is Defendant SNOOP DOGG’s “Spiritual
5 Advisor.”
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7
8 50. That night, in line with Defendants’ common scheme discussed above,
9 Defendant CAMPBELL invited Plaintiff and Plaintiff’s friend to go back to
10 Defendant SNOOP DOGG’s studio with Defendants CAMPBELL and SNOOP
11 DOGG. Plaintiff and Plaintiff’s friend agreed and went with Defendants CAMPBELL
12 and SNOOP DOGG.
13

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15 51. Later that same night, Plaintiff’s friend left around midnight because
16 Defendants made her uncomfortable and unsafe, leaving Plaintiff alone with
17 Defendants CAMPBELL and SNOOP DOGG. Defendant CAMPBELL offered to
18 Plaintiff, “I can take you home or I can take you back to my place with me.” Plaintiff
19 asked Defendant CAMPBELL to drop her off at her home.
20

21 52. Shortly thereafter, Plaintiff left with Defendant CAMPBELL and fell
22 asleep in the car. When Plaintiff awoke, Plaintiff was still in the car with Defendant
23 CAMPBELL. After a short time, Plaintiff and Defendant CAMPBELL arrived at
24 Defendant CAMPBELL’s home despite Plaintiff’s request that she be dropped off at
25 her home. Plaintiff was exhausted and fell asleep at Defendant CAMPBELL’s home.
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1 53. Around 4:00 AM the next morning, Plaintiff awoke to Defendant
2 CAMPBELL turning Plaintiff to face Defendant CAMPBELL. Defendant
3 CAMPBELL removed his penis from his pants and forced his penis in Plaintiff's face.
4 Defendant CAMPBELL repeatedly shoved his penis into Plaintiff's mouth.
5 Defendant CAMPBELL's penis was flaccid as he was forcing his penis into Plaintiff's
6 mouth. After some time, Defendant CAMPBELL turned away from Plaintiff leaving
7 her alone.
8

9 54. Defendant CAMPBELL leveraged his relationship, employment, and
10 agency of Defendants SNOOP DOGG, SNOOP DOGG's LLC, THE BROADUS
11 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
12 EVENTS, INC. to place himself in a position of power and authority over Plaintiff to
13 force Plaintiff to engage in sexual acts.
14

15 55. Because Plaintiff worked for Defendants, Defendant CAMPBELL
16 thought he was entitled to sexually abuse Plaintiff. Defendant CAMPBELL sexually
17 abused Plaintiff because he specifically viewed Plaintiff as one of his prostitutes
18 whom he could sexually abuse with impunity. Moreover, Defendant CAMPBELL
19 believed he was able to sexually assault and batter Plaintiff because he provided
20 Plaintiff with other work with SNOOP DOGG and the other Defendants, work which
21 Defendants all profited from.
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1 56. Defendant CAMPBELL discriminated against and harassed Plaintiff
2 because of Plaintiff's sex and gender.

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4 57. Defendant CAMPBELL sexually harassed, sexually assaulted, and
5 sexually battered Plaintiff.

6 58. Subsequently, Defendant CAMPBELL told Plaintiff, "***Here, put this***
7 ***dress on.***" Plaintiff was not feeling well, and replied, "***Can't I sleep? I don't feel***
8 ***well.***" Defendant CAMPBELL insisted and aggressively stated, "***Put the dress on***",
9 "***let's go to Snoop's videotaping. I want to see if he will make you the weather girl,***"
10 and "***C'mon Snoop wants you there,***" implying that Plaintiff did not have a choice.
11 Defendant CAMPBELL urged Plaintiff, "***Snoop wants you there. Let's go. This is a***
12 ***career move.***" Plaintiff complied in hopes of advancing her career.
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16 59. Although Plaintiff had a stomachache, she abided by Defendant
17 CAMPBELL's demands and put on the dress Defendant CAMPBELL ordered her to
18 wear in hopes of obtaining the GGN "Weather Girl" position and/or another job with
19 Defendants through future dancing jobs.
20

21 60. As other similarly situated women have described, it was common for
22 Defendant CAMPBELL to leverage his relationship, employment, and agency
23 afforded by Defendants SNOOP DOGG, SNOOP DOGG's LLC, THE BROADUS
24 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
25 EVENTS, INC. to place himself in a position of power and authority over these
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1 individuals to force them to engage in sexual acts. Defendant CAMPBELL has
2 additionally instructed others to wear specific outfits for him which he found to be
3 more attractive or thought his employer or Defendant SNOOP DOGG would find
4 more attractive.
5

6 61. Defendants were all aware of, encouraged, and allowed for Defendant
7 CAMPBELL and SNOOP DOGG to engage in, use, and profit from this scheme while
8 making women engage in sexual acts on them in exchange for employment
9 opportunities.
10

11 62. Defendants SNOOP DOGG, SNOOP DOGG's LLC, THE BROADUS
12 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
13 EVENTS, INC. created and produced a web video series which was uploaded on to
14 Youtube.com called, *GGN: Snoop Dogg's Double G News Network* ("GGN").
15

16 63. Defendant CAMPBELL was a star and actor for GGN appearing in many
17 of the shows.
18

19 64. Defendant CAMPBELL had the ability to bring actresses and models
20 onto the show.
21

22 65. Defendants profited from GGN as they received revenue from its viewers
23 who watched the show worldwide as it was posted on the internet for millions to see.
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1 66. One of the “important” or well-known roles that was on GGN was the
2 “Weather Girl.” Defendants hired models, usually scantily dressed or in bikinis, to
3 dance as they described the weather.
4

5 67. The “Weather Girl” position is what Defendant CAMPBELL told
6 Plaintiff she had the opportunity to be employed for, by explicitly telling Plaintiff, “*I*
7 *want to see if [Defendant SNOOP DOGG] will make you the weather girl,*” and that
8 this is “a career move.” Defendant CAMPBELL’s offer of employment blatantly
9 implies that money will be involved and that future employment was to be expected
10 with Defendants if she complied with Defendant CAMPBELL and SNOOP DOGG’s
11 demands. Defendant CAMPBELL’s statements showed that Defendant CAMPBELL
12 and SNOOP DOGG not only obtained revenue and profited off of GGN’s “Weather
13 Girls,” but that Defendant CAMPBELL and SNOOP DOGG had the complete
14 authority to hire, compensate, and make Plaintiff a “Weather Girl,” which would then
15 allow Plaintiff to advance her career.
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20 68. The “Weather Girls” for Defendants SNOOP DOGG, CAMPBELL,
21 SNOOP DOGG’s LLC, THE BROADUS COLLECTION, LLC, CASA VERDE
22 CAPITAL, LLC, and MERRY JANE EVENTS, INC. generated revenue and
23 viewership for Defendants that was worldwide. The position of “Weather Girl”
24 provided a potential source of income, exposure, and career advancement for Plaintiff.
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1 69. Defendants SNOOP DOGG, CAMPBELL, SNOOP DOGG's LLC, THE
2 BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY
3 JANE EVENTS, INC. continued to use these women as "Weather Girls," or dancers
4 for their shows, were aware of what these women were forced to do in order to obtain
5 employment, and allowed this conduct to continue while profiting from the revenue
6 and viewership the women generated for Defendants. The revenue and viewership
7 Defendants received was worldwide, as much of their revenue came from viewership
8 of the content that included these women and was posted on the Internet and social
9 media services such as Youtube.com, Facebook.com, and Instagram.

13 70. Defendant CAMPBELL, in furtherance of the scheme of recruiting and
14 enticing women to have sexual relations with himself and Defendant SNOOP DOGG
15 in exchange for employment opportunities, told Plaintiff what to wear so that
16 Defendant SNOOP DOGG would be more attracted to Plaintiff and inclined to hire
17 Plaintiff as a "Weather Girl." Moreover, Defendant CAMPBELL, unbeknownst to
18 Plaintiff, was essentially grooming Plaintiff and preparing Plaintiff to have sexual
19 relations with Defendant SNOOP DOGG in exchange for work as a "Weather Girl."

22 71. In short, it was Defendants' scheme and common practice for Defendant
23 CAMPBELL to "pimp out," prostitute, or exploit females interested in working for
24 Defendants to Defendant SNOOP DOGG and himself, thereby affecting interstate
25 commerce. This affected interstate commerce because Defendant CAMPBELL
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28

1 attempted to “pimp out,” prostitute, and/or exploit Plaintiff in exchange for putting
2 Plaintiff on GGN, an interstate internet/television show which obtained revenue from
3 individuals throughout the nation for Defendants, and would have obtained revenue,
4 employment, and future employment for Plaintiff.
5

6 72. Plaintiff and Defendant CAMPBELL arrived at the recording studio
7 where Defendant SNOOP DOGG filmed GGN. While waiting for production to
8 begin, Plaintiff observed the view out the window when Plaintiff made eye contact
9 with Defendant SNOOP DOGG in a window across the way. Defendant SNOOP
10 DOGG leered at Plaintiff, undressing her with his eyes.
11
12

13 73. Shortly thereafter, Plaintiff had a stomachache and went to the bathroom.
14 While Plaintiff was on the toilet, Defendant SNOOP DOGG opened the door to the
15 bathroom while Plaintiff was on the toilet. He then shut the door with him between the
16 door and Plaintiff on the toilet. Standing with his crotch in Plaintiff’s face, while
17 Plaintiff was defecating on the toilet, Defendant SNOOP DOGG removed his penis
18 from his pants and grabbed Plaintiff’s shoulder, and ordered Plaintiff, “***Put it in your***
19 ***mouth.***” Plaintiff was panicked and terrified. She further recalled Defendant SNOOP
20 DOGG’s criminal history including his alleged gang affiliation and previous rape
21 allegations, and reluctantly complied with Defendant SNOOP DOGG afraid for her
22 safety and for her life.
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1 74. After a few minutes, Defendant SNOOP DOGG withdrew his penis from
2 Plaintiff's mouth, visibly unsatisfied with Plaintiff's reluctance and disgust of being
3 forced to engage in oral sex with Defendant SNOOP DOGG, Defendant SNOOP
4 DOGG proceeded to masturbate and ejaculated on Plaintiff's upper chest and lower
5 neck. Defendant SNOOP DOGG stated, "*I'll be back, I'll get you something to clean*
6 *up with*" and left the bathroom. Defendant SNOOP DOGG never returned. He left
7 Plaintiff there humiliated, terrified and panicked.

8
9
10 75. Defendant SNOOP DOGG was aware of and knew that Plaintiff was
11 there to obtain a job and to hopefully be a "Weather Girl" for GGN. Defendant
12 SNOOP DOGG requested Defendant CAMPBELL bring Plaintiff to the studio which
13 is evidenced by Defendant CAMPBELL telling Plaintiff, "*Snoop wants you there.*"
14 Defendant SNOOP DOGG, SNOOP DOGG'S LLC, THE BROADUS
15 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
16 EVENTS, INC. was aware of, encouraged, and partook in the "pimp out,"
17 exploitation, and prostitution scheme, and instructed Defendant CAMPBELL to bring
18 Plaintiff to his studio for quid pro quo sexual acts in exchange for hiring Plaintiff as
19 the "Weather Girl," or dancer for his other shows.

20
21 76. Plaintiff denied Defendant SNOOP DOGG's sexual advances and
22 refused to be "pimped out," exploited, or prostituted by Defendants, which resulted in
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1 Defendants refusing to hire Plaintiff in retaliation for her rebuffing Defendant SNOOP
2 DOGG's sexual assault and battery.

3
4 77. Had Defendants hired Plaintiff, they would have profited from her and
5 obtained viewership because of her role as a "Weather Girl," or as a dancer and
6 performer at Defendants' other shows and concerts.

7
8 78. The assault and battery that Plaintiff was subjected to is similar to other
9 victims of Defendant SNOOP DOGG.

10 79. Defendant SNOOP DOGG sexually harassed, sexually assaulted, and
11 sexually battered Plaintiff.

12
13 80. Defendant SNOOP DOGG subjected Plaintiff to *quid pro quo*
14 harassment.

15
16 81. Defendant SNOOP DOGG's actions were sexually predatory. Plaintiff
17 found herself thinking about her job security if she displeased Defendant SNOOP
18 DOGG. Plaintiff felt pressured by Defendant SNOOP DOGG due to his dominance,
19 and his position of power over her, including his ability to hire and fire her and ensure
20 that she would never be hired at the "Weather Girl," or in his industry again.

21
22 82. Defendant SNOOP DOGG sexually assaulted and sexually battered
23 Plaintiff.

24
25 83. Shortly thereafter, Plaintiff, shocked, embarrassed, abandoned, and
26 dejected, cleaned herself off in the bathroom sink and exited the bathroom. Plaintiff
27

1 turned right and locked eyes with Defendant SNOOP DOGG who, once again, leered
2 at Plaintiff. Plaintiff feared for her life and job security, and walked away.

3
4 84. Plaintiff then went into the production room, lied on a couch, broke
5 down, and cried. Tedd Chung, a friend of Defendant SNOOP DOGG and one of
6 GGN's producers walked into the room with several other people to discuss the script
7 for the show. Mr. Chung then told Plaintiff to leave the room. Plaintiff left the room
8 and sat with Bokeem Woodbine next to the green screen.

9
10 85. Shortly thereafter, Defendant CAMPBELL spotted Plaintiff wandering
11 the studio and sitting on the couch with Mr. Woodbine, and waved her over to
12 Defendants CAMPBELL and SNOOP DOGG. Defendant CAMPBELL insisted,
13 ***"Come here! Take a picture with Snoop!"*** Plaintiff, mortified, embarrassed, and
14 fearing for her safety, walked over to Defendant SNOOP DOGG and stood next to
15 him for a picture. Defendant CAMPBELL took a picture of Plaintiff with Defendant
16 SNOOP DOGG. Defendant SNOOP DOGG told Defendant CAMPBELL, ***"Make***
17 ***sure you bring this one back."*** Plaintiff then left.

18
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21 86. Defendant SNOOP DOGG failed to hire Plaintiff because Plaintiff
22 refused to willingly and enthusiastically give oral sex to Defendant SNOOP DOGG,
23 and refused to orally give Defendant SNOOP DOGG an orgasm.

24
25 87. Because Plaintiff refused to do the above, Defendant SNOOP DOGG did
26 not hire Plaintiff as a "Weather Girl."
27
28

1 88. Defendants SNOOP DOGG and CAMPBELL abused their power as
2 Plaintiff's superiors and sexually assaulted and battered Plaintiff.

3
4 89. Plaintiff felt emotionally overwhelmed, anxious and violated.

5 90. Defendants' actions and conduct were directed at intentionally harming
6 Plaintiff.

7
8 91. As a result of the Defendants' discriminatory and intolerable treatment of
9 Plaintiff, Plaintiff has suffered anxiety, stress, depression, nightmares, sleep
10 disturbances, post-traumatic stress, headaches, severe emotional distress and physical
11 ailments.

12
13 92. Defendants sexually harassed, assaulted, and battered Plaintiff.

14 93. Defendants engaged in *quid pro quo* sexual harassment.

15
16 94. Defendants SNOOP DOGG and CAMPBELL discriminated against and
17 harassed Plaintiff because of Plaintiff's sex and gender; retaliated against Plaintiff for
18 refusing to engage in a sexually intimate relationship and failed to hire Plaintiff.

19
20 95. Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL, and
21 EVENTS sexually harassed, sexually assaulted, and sexually battered Plaintiff.

1 **III. Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL, and**
2 **EVENTS Most Recent Acts of Harassment, Retaliation, Defamation, False Light,**
3 **and Intentional Infliction of Emotional Distress Giving Rise to Causes of Action**
4 **Four through Thirteen**

5
6 96. Plaintiff and Defendants agreed to attempt to resolve this dispute through
7
8 a private mediation which took place on February 8, 2022 and finished early in the
9 morning on February 9, 2022.

10 97. The mediation was unsuccessful. Immediately after the mediation ended,
11
12 and in direct retaliation for Plaintiff's complaints of sexual assault and sexual battery,
13 Defendant SNOOP DOGG posted the below image on his Instagram, calling Plaintiff
14 a "***Gold digger***," while including emoji's of a judge and police officer, obviously
15 threatening, harassing, and retaliating against Plaintiff that he will take similar action
16 against Plaintiff that Defendant SNOOP DOGG did with Ms. Bell.
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98. Defendant SNOOP DOGG on behalf of himself and his entities, Defendants SNOOP, COLLECTION, CAPITAL, and EVENTS threatened Plaintiff with criminal prosecution and a lawsuit, and harassed Plaintiff because she complained of sexual harassment, assault, and battery.

99. Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL, and EVENTS retaliated against Plaintiff through the above Instagram post by posting emojis of a police officer, a judge, and money, insinuating that much like Defendant SNOOP DOGG had done in the past against Ms. Bell, and to intimidate and scare Plaintiff, that Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL, and

1 EVENTS will sue Plaintiff for extortion and will file criminal charges against
2 Plaintiff.

3
4 100. As a result of Defendants SNOOP DOGG, SNOOP, COLLECTION,
5 CAPITAL, and EVENTS' threats of retaliating against Plaintiff with a false claim of
6 extortion, coupled with Defendants' history, forced Plaintiff to immediately file the
7 pending lawsuit after Defendant SNOOP DOGG posted the above picture on
8 Instagram.

9
10 101. Moreover, Defendants SNOOP DOGG, SNOOP, COLLECTION,
11 CAPITAL, and EVENTS, through this Instagram post, which has since been deleted,
12 also violated California Labor Code 1102.5 by retaliating against Plaintiff for her
13 complaints of sexual harassment, assault, and battery.

14
15 102. Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL, and
16 EVENTS pattern and practice of threats, retaliation, harassment, and intimidation
17 unfortunately and unsurprisingly did not stop there.

18
19 103. Around February 11, 2022, through Defendant SNOOP DOGG's
20 counsel, Defendant SNOOP DOGG threatened and retaliated against Plaintiff and
21 Plaintiff's Counsel by stating "he will pursue a malicious prosecution action against
22 your client and your firm seeking tens of millions of dollars in damages." Said threat
23 was in direct retaliation for Plaintiff's claims of and complaints of unlawful sexual
24 harassment, assault, and battery.

1 104. After the pending lawsuit was filed on February 9, 2022, Defendants
 2 SNOOP DOGG, SNOOP, COLLECTION, CAPITAL, and EVENTS authorized a
 3 “spokesperson” for Defendant SNOOP DOGG to release a statement to a journalist
 4 with Mediaite.com on February 11, 2022. The spokesperson that was authorized to
 5 speak on behalf of Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL,
 6 and EVENTS stated (“Defamatory Statement”):
 7

8 The allegations by [Jane Doe] of sexual assault by Calvin Broadus
 9 (known as Snoop Dogg), are simply meritless. They appear to be part of
 10 a self-enrichment shakedown scheme by [Jane Doe] to extort Snoop
 11 Dogg...[Jane Doe]’s scheme involves concocting a legal complaint as an
 12 anonymous “Jane Doe” plaintiff, and, knowing full well it can be a public
 13 document, filing this complaint late Wednesday, only three days before
 14 the Super Bowl. In the complaint, [Jane Doe] manufactures an
 15 occurrence of more than 8 years ago, in 2013, for her false
 16 allegations...[Jane Doe]’s shakedown scheme is disgraceful. Her attempt
 17 to use the courts to advance this scheme is shameful too, and does a
 18 disservice to real victims who deserve to be believed.
 [Plaintiff’s name has been redacted from Defendants’ statement above.
 The original contained Plaintiff’s true identity despite the action being
 pursued anonymously.]

19 105. After this statement which revealed Plaintiff’s name, Plaintiff’s Counsel
 20 released this statement:
 21

22 We have been made aware by a reporter that a “spokesperson” for
 23 Calvin Broadus (known as Snoop Dogg) released the name of our client
 24 to that reporter.

25 Sexual assault victims are allowed to proceed anonymously for
 26 their own protection. Courts allow pseudonyms “when necessary to
 27 protect the privacy of ... rape victims.” The “public generally has a strong
 28 interest in protecting the identities of sexual assault victims so that other
 victims will not be deterred from reporting such crimes.” These laws also

1 protect the safety of sexual assault victims. We believe this is especially
2 true when a Defendant has a criminal history.

3 By Mr. Broadus' spokesperson revealing our client's real name,
4 this falls right in step with what we believe to be Mr. Broadus' *modus*
5 *operandi* of harassing and intimidating women who oppose sexual
6 misconduct or oppose him. We believe it is the Defendants' intention to
attack and intimidate any woman who goes against them.

7 We are disgusted and appalled that a spokesperson for Mr.
8 Broadus would do something so malicious. It takes a lot for women to
9 finally muster the courage to come forward against their harassers. It is
10 even harder for a woman to come forward against a sexual harasser who
11 has an extensive criminal history and is idolized by millions. It is obvious
12 that survivors should never have to face intimidation and threats from
13 their harassers. Broadus' spokesperson's revelation of the Plaintiff's real
14 name in this case is abhorrent. There are laws to protect their identities
for a reason. We have concerns for our client's safety now that her
identity has been revealed.

15 Our client had the courage to stand up for her rights and decided
16 that her story could no longer be silenced. Our client does not have the
17 power of over 60 million Instagram followers or the elite celebrity status
18 of "Snoop Dogg" and everything that comes with it. She is just one
19 woman who was brave enough to stand up for herself. We applaud her
20 bravery and hope that Mr. Broadus and his spokesperson's actions do not
21 further deter women from coming forward against their sexual harassers.
22 If enough women will stand up against their harassers, we will see a
23 change for the better. However, if harassers like Mr. Broadus continue to
retaliate against those who stand up to them, we are concerned there will
be a disastrous chilling effect, and women will not come forward out of
fear of retaliation. Even worse, harassers would feel emboldened to
sexually assault without fear of consequences.

24 It is hypocritical to accuse our client of performing a disservice to
25 other victims when this spokesperson just released the name of a
26 survivor. This conduct may instill fear in other victims that their names
27 will also be released in public despite the protections the law has given
28 them.

1 We are passionate and will continue to fight for our client. The
2 “Jane Doe” status is available to victims of sexual assault and must be
3 protected. We thank all individuals who have come forward to stand
4 with our client, and hope that this conduct does not scare others from
5 coming forward with their stories. We thank those who have shared with
6 us over the past couple of days their experiences with Defendants. We
7 encourage other victims to always come forward. **We also thank all
8 news outlets that refuse to publish the real name of our client.** We
9 will continue to protect sexual assault survivors and fight for their
10 rights.
11

12 Until the appropriate time when a motion is made to address
13 Plaintiff’s right to proceed anonymously. We hereby request that
14 Defendants’ be enjoined from making any further public reference to
15 Plaintiff’s true identity.
16

17 106. Despite the fact that Plaintiff has redacted her name, which is her right in
18 the pending lawsuit and a protection that the law has afforded her and other similarly
19 situated victims of sexual harassment, assault, and battery, Defendants intimidated,
20 threatened, and scared Plaintiff and other victims of sexual harassment, assault, and
21 battery by releasing Plaintiff’s name to the media, public, and millions of people.
22

23 107. By releasing Plaintiff’s name, Defendants SNOOP DOGG, SNOOP,
24 COLLECTION, CAPITAL, and EVENTS yet again, demonstrate how they continue
25 the pattern and practice of scaring, intimidating, retaliating against, and harassing
26 victims of sexual harassment, assault, and battery.
27

28 108. Defendants released her name with the knowledge, intention, and hope
that Defendants’ millions of followers would harass, intimidate, and threaten Plaintiff.

1 109. Because Defendants knowingly released Plaintiff's name to the public,
2 Plaintiff has been subjected to harassment by Defendants' followers who have
3 intimidated, threatened, and called Plaintiff names through Instagram and social
4 media.
5

6 110. Defendant SNOOP DOGG has a large following and the ability to make
7 threats to individuals and recruit other individuals to follow through with his threats.
8 Defendant SNOOP DOGG has made them in the past, has made them to Plaintiff, and
9 revealed her name to his millions of followers, intentionally making Plaintiff
10 vulnerable to further retaliation from Defendants and their followers, especially
11 considering Defendant SNOOP DOGG's past and what was stated in Ms. Bells
12 Complaint, "[Defendant SNOOP DOGG] **was a gang member and that he would**
13 **send someone to kill her if she reported the incident to the police.**"
14
15
16

17 111. Plaintiff's fear stems from the fact that Defendant SNOOP DOGG has
18 threatened numerous women as shown above. For example, Defendant SNOOP
19 DOGG told Iggy Azalea, "*And your n**ga betta check you before I do,*" and Gayle
20 King, "*Respect the family and back off bitch, before we come get you.*" Considering
21 Defendant SNOOP DOGG's fan base and following, it is terrifying to imagine what
22 he means when he also told Ms. King, "*Before we come get you.*"
23
24

25 112. Plaintiff fears that Defendant SNOOP DOGG will continue to carry out
26 these threats.
27
28

1 113. Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL, and
2 EVENTS released this statement with the intent and effect of revictimizing Plaintiff,
3
4 destroying her professional reputation, outing Plaintiff's identity so Defendants'
5 millions of followers can also retaliate, harass, and threaten Plaintiff, and subjecting
6 Plaintiff to violence and threats of violence from Defendants' millions of followers
7
8 and supporters, causing Plaintiff severe emotional distress.

9 114. Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL, and
10 EVENTS retaliated against, harassed, intimidated, and threatened Plaintiff.
11

12 115. Moreover, Defendants SNOOP DOGG, SNOOP, COLLECTION,
13 CAPITAL, and EVENTS, through this statement has also violated California Labor
14 Code 1102.5 by retaliating against Plaintiff for her complaints of sexual harassment,
15
16 assault, and battery.

17 116. Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL, and
18 EVENTS through their spokesperson, publicly called Plaintiff a liar by stating she
19
20 "concocted" her claims, and that Plaintiff attempted to "extort" Defendants, ironically
21 and ridiculously making Plaintiff out to be the one attempting to "shakedown"
22 Defendants.
23

24 117. In the statement above in Paragraph 103, Defendants SNOOP DOGG,
25 SNOOP, COLLECTION, CAPITAL, and EVENTS, through their spokesperson, said
26

27 (a) *They appear to be a part of a self-enrichment shakedown scheme.*
28

1 (b) *To extort Snoop Dogg*

2 (c) *In the complaint, [Jane Doe] manufactures an occurrence of more*
3 *than 8 years ago, in 2013, for her false allegations.*

4 (d) *[Jane Doe's] scheme involves concocting a legal complaint*

5 (e) *Mr. Broadus has never had any sexual encounter whatsoever with*
6 *[Jane Doe.]*

7
8
9 118. Each of the purported statements of fact set forth above is false.

10 119. The defamatory statements has a natural tendency to injure Plaintiff's
11 reputation.
12

13 120. The Defamatory statements were published by Defendants knowing that
14 they were false.
15

16 121. In the alternative, the Defamatory statements and each of them were
17 published with reckless disregard as to their falsity.
18

19 122. Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL, and
20 EVENTS defamed Plaintiff.

21 123. Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL, and
22 EVENTS placed Plaintiff in a false light.
23

24 124. Defendants disparately treated, disparately impacted, harassed and
25 discriminated against Plaintiff because of Plaintiff's sex and gender; subjected
26 Plaintiff to a hostile work environment and sexual harassment; failed to hire and
27
28

1 retaliated against Plaintiff because of Plaintiff's sex and gender, and because Plaintiff
2 failed to willingly and enthusiastically participate in the oral sexual rape of Plaintiff.
3

4 125. As a result of Defendants' discriminatory and intolerable treatment,
5 Plaintiff suffered and continues to suffer from anxiety, loss of sleep, stress, and severe
6 emotional distress.
7

8 126. Because of the acts and conduct complained of herein, Plaintiff has
9 suffered and will continue to suffer the loss of income, bonuses, benefits, and other
10 compensation, which such employment entails. Plaintiff has also suffered pecuniary
11 losses, emotional pain, suffering, inconvenience, loss of enjoyment of life, and other
12 non-pecuniary losses.
13

14 127. As Defendants' conduct has been malicious, willful, outrageous, and
15 conducted with full knowledge of the law, Plaintiff demands Punitive Damages
16 against Defendants.
17

18 128. Plaintiff claims a continuous practice of discrimination and claims a
19 continuing violation and makes all claims herein under the continuing violations
20 doctrine.
21

22 129. Plaintiff further claims aggravation, activation, and/or exacerbation of
23 any preexisting conditions as a result of Defendants' discriminatory conduct.
24

25 130. Plaintiff claims actual discharge and wrongful termination.
26
27
28

1 through, inter alia, their use of the internet, phones, text messages, advertising,
2 promotion, and interstate concerts. Furthermore, the above “Weather Girl” position
3 Defendants were using to entice Plaintiff for sex acts was a position on Defendants’
4 interstate internet television show from which Defendants profited. Defendants
5 SNOOP DOGG’S LLC, THE BROADUS COLLECTION, LLC, CASA VERDE
6 CAPITAL, LLC, and MERRY JANE EVENTS, INC. in effecting interstate
7 commerce by producing, running, and starring in the interstate internet television
8 show GGN, through the enticement and recruitment of working at interstate music
9 concerts and interstate internet television shows, enticed and recruited Plaintiff to
10 appear at Defendants studio and be sexually assaulted and battered. Thereafter,
11 because Plaintiff was not a willing and enthusiastic participant in the sexual assault
12 and battery, Defendants failed to place Plaintiff in the role of “Weather Girl” on the
13 interstate internet/television show, preventing Plaintiff from additionally being
14 compensated for her work. Defendants enticed and recruited Plaintiff to be a
15 “Weather Girl” and committed the sexual assault and battery on Plaintiff by force.
16 Through Defendants’ sexual assault and battery, Defendants SNOOP DOGG’S LLC,
17 THE BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and
18 MERRY JANE EVENTS, INC. all would have profited and obtained revenue from
19 Plaintiff if she has been made a “Weather Girl.” It was Defendants’ scheme to profit
20 from the “pimping out,” prostitution, and exploitation of females by using them to
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1 obtain viewership and revenue from Defendants' viewers who watched GGN to see
 2 the "Weather Girls." Through this scheme and attempted prostitution of Plaintiff,
 3 Defendants SNOOP DOGG, CAMPBELL, SNOOP DOGG'S LLC, THE BROADUS
 4 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
 5 EVENTS, INC. continued to produce GGN with "Weather Girls," made money off of
 6 the "Weather Girls," and attempted to make money by using Plaintiff as a "Weather
 7 Girl," had she not complained of and rejected the sexual assault and battery of
 8 Defendants.
 9
 10
 11

12 135. Plaintiff brings this claim pursuant to all applicable sections of 18
 13 U.S.C.A. §§ 1591, 1595 in that "An individual who is a victim of a violation of
 14 Section 1589, 1590, or 1591 of title 18, United States Code, may bring a civil action
 15 in any appropriate district court of the United States. The court may award actual
 16 damages, punitive damages, reasonable attorneys' fees, and other litigation costs
 17 reasonably incurred." 18 U.S.C.A. §1595(a).
 18
 19

20 136. 18 USC § 1591. Sex trafficking of children or by force, fraud, or coercion
 21 states as follows:
 22

23 (a) Whoever knowingly--

24 (1) in or affecting interstate or foreign commerce, or within the special maritime
 25 and territorial jurisdiction of the United States, recruits, entices, harbors,
 26 transports, provides, obtains, advertises, maintains, patronizes, or solicits by any
 27 means a person; or
 28

(2) benefits, financially or by receiving anything of value, from participation in
 a venture which has engaged in an act described in violation of paragraph (1),

1 knowing, or, except where the act constituting the violation of paragraph (1) is
 2 advertising, in reckless disregard of the fact, that means of force, threats of
 3 force, fraud, coercion described in subsection (e)(2), or any combination of
 4 such means will be used to cause the person to engage in a commercial sex act,
 5 or that the person has not attained the age of 18 years and will be caused to
 6 engage in a commercial sex act, shall be punished as provided in subsection (b).

(b) The punishment for an offense under subsection (a) is--

(1) if the offense was effected by means of force, threats of force, fraud, or coercion described in subsection (e)(2), or by any combination of such means, or if the person recruited, enticed, harbored, transported, provided, obtained, advertised, patronized, or solicited had not attained the age of 14 years at the time of such offense, by a fine under this title and imprisonment for any term of years not less than 15 or for life; or

(2) if the offense was not so effected, and the person recruited, enticed, harbored, transported, provided, obtained, advertised, patronized, or solicited had attained the age of 14 years but had not attained the age of 18 years at the time of such offense, by a fine under this title and imprisonment for not less than 10 years or for life.

(c) In a prosecution under subsection (a)(1) in which the defendant had a reasonable opportunity to observe the person so recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, or solicited, the Government need not prove that the defendant knew, or recklessly disregarded the fact, that the person had not attained the age of 18 years.

(d) Whoever obstructs, attempts to obstruct, or in any way interferes with or prevents the enforcement of this section, shall be fined under this title, imprisoned for a term not to exceed 25 years, or both.

(e) In this section:

(1) The term "abuse or threatened abuse of law or legal process" means the use or threatened use of a law or legal process, whether administrative, civil, or criminal, in any manner or for any purpose for which the law was not designed, in order to exert pressure on another person to cause that person to take some action or refrain from taking some action.

(2) The term "coercion" means--

(A) threats of serious harm to or physical restraint against any person;

(B) any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm to or physical restraint against any person; or

(C) the abuse or threatened abuse of law or the legal process.

(3) The term "commercial sex act" means any sex act, on account of which anything of value is given to or received by any person.

(4) The term “participation in a venture” means knowingly assisting, supporting, or facilitating a violation of subsection (a)(1).

(5) The term “serious harm” means any harm, whether physical or nonphysical, including psychological, financial, or reputational harm, that is sufficiently serious, under all the surrounding circumstances, to compel a reasonable person of the same background and in the same circumstances to perform or to continue performing commercial sexual activity in order to avoid incurring that harm.

(6) The term “venture” means any group of two or more individuals associated in fact, whether or not a legal entity.

137. Additionally, 18 USCA § 1595. Civil remedy states as follows:

(a) An individual who is a victim of a violation of this chapter may bring a civil action against the perpetrator (or whoever knowingly benefits, financially or by receiving anything of value from participation in a venture which that person knew or should have known has engaged in an act in violation of this chapter) in an appropriate district court of the United States and may recover damages and reasonable attorneys fees.

(b)(1) Any civil action filed under subsection (a) shall be stayed during the pendency of any criminal action arising out of the same occurrence in which the claimant is the victim.

(2) In this subsection, a “criminal action” includes investigation and prosecution and is pending until final adjudication in the trial court.

(c) No action may be maintained under subsection (a) unless it is commenced not later than the later of--

(1) 10 years after the cause of action arose; or

(2) 10 years after the victim reaches 18 years of age, if the victim was a minor at the time of the alleged offense.

138. Broad, expansive language is employed in Trafficking Victims Protection Act (TVPA) and its remedial provision, which permits civil actions for damages under TVPA. *Noble v Weinstein*, 335 F Supp 3d 504 [SDNY 2018], not to certify appeal denied, 17-CV-09260 (AJN), 2019 WL 3940125 [SDNY Aug. 5, 2019]

1 139. Defendants subjected Plaintiffs to commercial sex acts by force and
2 coercion, including both physical and financial.

3
4 140. 18 U.S.C. 1591 § (e)(3) defines a “commercial sex act” as “any sex act,
5 on account of which anything of value is given to or received by any person.”

6
7 141. A commercial sex act means any sex act, on account of which anything
8 of value is given to or received by any person. The specific conditions are the use of
9 force, fraud, or coercion, or conduct involving persons under the age of 18. See the
10 Department of Justice’s definition: [https://www.justice.gov/crt/involuntary-servitude-](https://www.justice.gov/crt/involuntary-servitude-forced-labor-and-sex-trafficking-statutesenforced)
11 [forced-labor-and-sex-trafficking-statutesenforced](https://www.justice.gov/crt/involuntary-servitude-forced-labor-and-sex-trafficking-statutesenforced). “Section 1591 criminalizes sex
12 trafficking, which is defined as causing a person to engage in a commercial sex act
13 under certain statutorily enumerated conditions. A commercial sex act means any sex
14 act, on account of which anything of value is given to or received by any person. The
15 specific conditions are the use of force, fraud, or coercion, or conduct involving
16 persons under the age of 18.”

17
18
19
20 142. Defendants conditioned Plaintiff’s employment, on Defendants’ ability to
21 continue to sexually assault and engage in forced sex acts. Additionally, the financial
22 aspect to the relationship was also an element of the “forced” sex acts.

23
24 143. Defendants knowingly recruited, enticed, harbored, and/or obtained
25 Plaintiff through means of force, threats of force, and by a combination of such
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1 forceful means, and forcibly caused Plaintiff to engage in an unwanted sexual act for a
2 commercial benefit.

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4 144. 18 USC 1594 further provides liability for “Whoever conspires with
5 another to violate section 1591” Defendants further conspired to violate 1591 as stated
6 herein.

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8 145. 18 USC 1594 further states that it shall be unlawful for anyone who
9 “obstructs, attempts to obstruct, or in any way interferes with or prevents the
10 enforcement of this section.” Assuming Defendants take such retaliatory action as
11 stated above, Plaintiff makes a claim for such.

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13 146. Defendants are liable to Plaintiffs under 18 USCA § 1591, 1594 and
14 1595.

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17 **SECOND CAUSE OF ACTION**

18 **FOR SEXUAL BATTERY**

19
20 (Against Defendants SNOOP DOGG, CAMPBELL, SNOOP DOGG’S LLC, THE
21 BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY
22 JANE EVENTS, INC.)

23 147. Plaintiff incorporates by reference and re-alleges the preceding
24 paragraphs, as though fully stated herein.

25 148. As described herein above, Defendants SNOOP DOGG and
26 CAMPBELL caused, and intended to cause, imminent apprehension of a harmful and
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1 offensive contact with an intimate part of another. In doing these acts, Defendants
2 SNOOP DOGG and CAMPBELL caused, and intended to cause, imminent
3 apprehension of a harmful and offensive contact with Plaintiff, in violation of, inter
4 alia, Civil Code section 1708.5, and related laws. At no time did Plaintiff consent to
5 any of the acts of Defendants SNOOP DOGG and CAMPBELL described herein.
6

7
8 149. As a result of Defendants SNOOP DOGG and CAMPBELL's conduct,
9 Plaintiff was placed in apprehension and fear for her physical well-being.

10 150. Defendants SNOOP DOGG and CAMPBELL's sexual battery involved
11 actual physical contact.
12

13 151. Defendants SNOOP DOGG and CAMPBELL did the aforementioned
14 acts with the intent to cause a harmful or offensive contact with an intimate part of
15 Plaintiff's person and would offend a reasonable sense of personal dignity. Further,
16 said acts did cause a harmful or offensive contact with an intimate part of Plaintiff's
17 person that would offend a reasonable sense of personal dignity.
18

19
20 152. Because of Defendants SNOOP DOGG and CAMPBELL's position of
21 authority over Plaintiff, and Plaintiff's mental and emotional state, Plaintiff was unable
22 to, and did not, give legal consent to such acts.
23

24 153. As a direct, legal and proximate result of the acts of Defendants SNOOP
25 DOGG and CAMPBELL, Plaintiff sustained serious and permanent injuries to her
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1 person, all of her damage in an amount to be shown according to proof and within the
2 jurisdiction of the Court.

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4 154. Defendants SNOOP DOGG, CAMPBELL, SNOOP DOGG'S LLC, THE
5 BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY
6 JANE EVENTS, INC., knew or should have known, of the assaults and batteries, but
7 ratified the conduct, as described herein above, by failing to adequately, or at all take
8 remedial steps against Defendants SNOOP DOGG and CAMPBELL, refusing to
9 intervene to protect Plaintiff, among other acts of ratification. As Plaintiff's
10 employers and by ratifying Defendants SNOOP DOGG and CAMPBELL's
11 misconduct, Defendants SNOOP DOGG, CAMPBELL, SNOOP DOGG'S LLC, THE
12 BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY
13 JANE EVENTS, INC., are liable to Plaintiff for battery and assault.

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17 155. Plaintiff claims estoppel with regard to certain Statutes of Limitations in
18 light of unconscionable acts that deterred her from filing claims as required to state
19 theory of estoppel. Bianco v Warner, 221CV03677FLAMARX, 2021 WL 4840470
20 [CD Cal Oct. 7, 2021]
21

22 156. As a proximate result of the wrongful acts of Defendants, and each of
23 them, Plaintiff has been harmed in that Plaintiff has suffered actual, consequential and
24 incidental financial losses, including without limitation loss of salary and benefits, and
25 the intangible loss of employment-related opportunities for growth in her field and
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1 damage to her reputation, all in an amount subject to proof at the time of trial. Plaintiff
2 claims such amounts as damages together with prejudgment interest pursuant to Civil
3 Code sections 3287 and/or 3288 and/or any other provision of law providing for
4 prejudgment interest.
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6 157. As a proximate result of the wrongful acts of Defendants, and each of
7 them, Plaintiff has suffered and continues to suffer anxiety, worry, embarrassment,
8 humiliation, mental anguish, and emotional distress. Plaintiff has further experienced
9 other physical symptoms arising from the wrongful acts of Defendants, and each of
10 them. Plaintiff will continue to experience said pain and physical and emotional
11 suffering for a period in the future she cannot presently ascertain, all in an amount
12 subject to proof at the time of trial.
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15 158. The acts taken toward Plaintiff were carried out by and/or ratified by
16 Defendants and/or managing agent employees of Defendants acting in a despicable,
17 oppressive, fraudulent, malicious, deliberate, egregious, and inexcusable manner
18 pursuant to California Civil Code Section 3294, in order to injure and damage
19 Plaintiff, thereby justifying an award to them of punitive damages in a sum
20 appropriate to punish and make an example of Defendants, and each of them.
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THIRD CAUSE OF ACTION

FOR SEXUAL ASSAULT

(Against Defendants SNOOP DOGG, CAMPBELL, SNOOP DOGG'S LLC, THE BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE EVENTS, INC.)

159. Plaintiff incorporates by reference and re-alleges the preceding paragraphs, as though fully stated herein.

160. Defendants SNOOP DOGG and CAMPBELL committed overt acts of sexual abuse, assault, and battery against Plaintiff.

161. Defendants SNOOP DOGG and CAMPBELL intended to inflict a harmful or offensive conduct against Plaintiff and intended to cause Plaintiff to fear such contact. Defendants SNOOP DOGG and CAMPBELL knew that the consequence of an offensive contact was certain to result, as Defendants SNOOP DOGG and CAMPBELL's sexual abuse was intentionally inflicted.

162. Defendants SNOOP DOGG and CAMPBELL's actions placed Plaintiff in apprehension of an immediate harmful or offensive contact.

163. Plaintiff did not consent to Defendants SNOOP DOGG and CAMPBELL's harmful or offensive contact with Plaintiff's person, or to Defendant SNOOP DOGG and CAMPBELL's conduct, putting Plaintiff in imminent apprehension of such contact.

1 164. In doing the things herein alleged, Defendants SNOOP DOGG and
2 CAMPBELL violated Plaintiff's right under California Civil Code § 43 of protection
3 from bodily restraint or harm, and from personal insult. In doing the things herein
4 alleged, Defendants SNOOP DOGG and CAMPBELL violated their duty, pursuant to
5 California Civil Code §1708, to abstain from injuring the person of Plaintiff or
6 infringing upon her rights.
7

8
9 165. Under the Code of Civil Procedure Section 340.16, "In any civil action
10 for recovery of damages suffered as a result of sexual assault, where the assault
11 occurred on or after the plaintiff's 18th birthday, the time for commencement of the
12 action shall be the later of the following: (1) Within 10 years from the date of the last
13 act, attempted act, or assault with the intent to commit an act, of sexual assault by the
14 defendant against the plaintiff."
15

16
17 166. Plaintiff claims estoppel with regard to certain Statutes of Limitations in
18 light of unconscionable acts that deterred her from filing claims as required to state
19 theory of estoppel. Bianco v Warner, 221CV03677FLAMARX, 2021 WL 4840470
20 [CD Cal Oct. 7, 2021]
21

22 167. Defendants SNOOP DOGG, CAMPBELL, SNOOP DOGG'S LLC, THE
23 BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY
24 JANE EVENTS, INC. knew or should have known, of the assaults and batteries, but
25 ratified the conduct, as described herein above, by failing to adequately, or at all take
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1 remedial steps against Defendants SNOOP DOGG and CAMPBELL, refusing to
2 intervene to protect Plaintiff, among other acts of ratification. As Plaintiff's
3 employers and by ratifying Defendants SNOOP DOGG and CAMPBELL's
4 misconduct, Defendants SNOOP DOGG, CAMPBELL, SNOOP DOGG'S LLC, THE
5 BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY
6 JANE EVENTS, INC., are liable to Plaintiff for assault.
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9 168. As a result of the above-described conduct, Plaintiff has suffered and
10 continues to suffer great pain of mind and body, shock, emotional distress, physical
11 manifestations of emotional distress including embarrassment, loss of self-esteem,
12 disgrace, humiliations, and loss of enjoyment of life; has suffered and continues to
13 suffer and was prevented and will continue to be prevented from performing daily
14 activities and obtaining the full enjoyment of life; will sustain loss of earnings and
15 earning capacity, and/or has incurred and will continue to incur expenses for medical
16 and psychological treatment, therapy, and counseling.
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20 169. Defendants SNOOP DOGG and CAMPBELL's sexual assault is a
21 substantial factor in bringing about these harms to Plaintiff.
22

23 170. The conduct of Defendants was oppressive, malicious and despicable in
24 that it was intentional and done in conscious disregard for the rights and safety of
25 others, and were carried out with a conscious disregard of her right to be free from
26 such tortious behavior, such as to constitute oppression, fraud or malice pursuant to
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1 California Civil Code section 3294, entitling Plaintiff to punitive damages against
2 Defendants in an amount appropriate to punish and set an example of Defendants.
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5 **FOURTH CAUSE OF ACTION**

6 **FOR RETALIATION UNDER TITLE VII**

7
8 (Against Defendants SNOOP DOGG, SNOOP DOGG’S LLC, THE BROADUS
9 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
EVENTS, INC.)

10 171. Plaintiff incorporates by reference and re-alleges the preceding
11 paragraphs, as though fully stated herein.
12

13 172. Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e-
14 3(a) provides that it shall be unlawful employment practice for an employer: “(1) to . .
15 . discriminate against any of his employees . . . because he has opposed any practice
16 made an unlawful employment practice by this subchapter, or because he has made a
17 charge, testified, assisted or participated in any manner in an investigation,
18 proceeding, or hearing under this subchapter.”
19
20

21 173. When Plaintiff complained of sexual harassment, assault, battery, and
22 retaliation, Defendants Retaliated against Plaintiff by subjecting her to further
23 harassment, threats of criminal charges, threats of a lawsuit worth tens of millions of
24 dollars, intimidation, defamation, and retaliation. Defendants took no corrective
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1 action which resulted in Plaintiff being subjected to continued harassment, threats of
2 criminal charges, intimidation, defamation, and retaliation.

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4 174. Defendants engaged in unlawful employment practices prohibited by 42
5 U.S.C. 2000e et seq. by discriminating against Plaintiff with respect to the terms,
6 conditions or privileges of employment because of her opposition to the unlawful
7 employment practices of Defendants, including but not limited to sexual harassment,
8 sexual assault, sexual battery, hostile work environment, and retaliation.

9
10 175. Defendants violated the above and Plaintiff suffered numerous damages
11 as a result.
12

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14 **FIFTH CAUSE OF ACTION**

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16 **FOR RETALIATION IN VIOLATION OF THE FEHA [CAL.**

17 **GOV'T CODE §§12940(H)]**

18 (Against Defendants SNOOP DOGG, SNOOP DOGG'S LLC, THE BROADUS
19 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
20 EVENTS, INC.)
21

22 176. Plaintiff incorporates by reference and re-alleges the preceding
23 paragraphs as though fully stated herein.
24

25 177. It is an unlawful employment practice to discharge, expel, or otherwise
26 discriminate against any person because the person has engaged in protected activity
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1 under *Government Code* §12940. [Cal. Gov't Code §12940(h)]. Plaintiff engaged in
2 protected activity by making complaints of discrimination, sexual harassment, assault,
3 and battery as set forth above.
4

5 178. When Plaintiff complained of sexual harassment, assault, battery, and
6 retaliation, Defendants Retaliated against Plaintiff by subjecting her to further
7 harassment, threats of criminal charges, threats of a lawsuit worth tens of millions of
8 dollars, intimidation, defamation, and retaliation. Defendants took no corrective
9 action which resulted in Plaintiff being subjected to continued harassment, threats of
10 criminal charges, intimidation, defamation, and retaliation.
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13 179. As a result of engaging in protected activity, Plaintiff suffered adverse
14 actions by Defendants as set forth above.
15

16 180. There is a causal link between Plaintiff's protected activity and the
17 adverse actions taken against Plaintiff due to Defendants' knowledge of Plaintiff's
18 protected activity of complaining and filing the pending lawsuit, the proximity of time
19 between said protected activities and the retaliatory actions, and the pattern of
20 Defendants' conduct.
21

22 181. Defendants' conduct as alleged above constituted unlawful retaliation in
23 violation of the FEHA.
24

25 182. As a proximate result of the wrongful acts of Defendants, Plaintiff has
26 been harmed in that Plaintiff has suffered actual, consequential and incidental
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1 financial losses, including without limitation loss of salary and benefits, and the
2 intangible loss of employment-related opportunities for growth in Plaintiff's field and
3 damage to Plaintiff's professional reputation, all in an amount subject to proof at the
4 time of trial. Plaintiff claims such amounts as damages together with prejudgment
5 interest pursuant to *Civil Code* Sections 3287 and/or 3288 and/or any other provision
6 of law providing for prejudgment interest.
7

9 183. As a proximate result of the wrongful acts of Defendants, and each of
10 them, Plaintiff has suffered and continues to suffer anxiety, worry, embarrassment,
11 humiliation, mental anguish, and emotional distress and has incurred and will likely
12 incur, medical expenses as a result. Plaintiff will continue to experience said pain and
13 mental and emotional suffering for a period in the future Plaintiff cannot presently
14 ascertain, all in an amount subject to proof at the time of trial.
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17 184. As a proximate result of the wrongful acts of Defendants, and each of
18 them, Plaintiff has been forced to hire attorneys to prosecute Plaintiff's claims herein,
19 and has incurred and is expected to continue to incur attorneys' fees and costs in
20 connection therewith. Plaintiff is entitled to recover such attorneys' fees and costs
21 under California *Government Code* Section 12965(b) and/or any other provision of
22 law providing for attorney's fees and costs.
23

25 185. The acts taken toward Plaintiff were carried out by and/or ratified by
26 Defendants and/or managing agent employees of Defendants acting in a despicable,
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1 oppressive, fraudulent, malicious, deliberate, egregious, and inexcusable manner in
2 order to injure and damage Plaintiff, thereby justifying an award to Plaintiff of
3 punitive damages in a sum appropriate to punish and make an example of Defendants.
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7 **SIXTH CAUSE OF ACTION**

8 **FOR HARASSMENT IN VIOLATION OF THE FEHA [CAL. GOV'T CODE**

9 **§12940(J)]**

10 (Against Defendants SNOOP DOGG, SNOOP DOGG'S LLC, THE BROADUS
11 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
12 EVENTS, INC.)
13

14 186. Plaintiff incorporates by reference and re-alleges the preceding
15 paragraphs, as though fully stated herein.
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17 187. At all times relevant for purposes of this Complaint, Gov't Code §12900
18 et seq. were in full force and effect and were binding on all Defendants. Gov't Code
19 §12940(j)(1) states that it is unlawful "For an employer, labor organization,
20 employment agency, apprenticeship training program or any training program leading
21 to employment, or any other person, because of race, religious creed, color, national
22 origin, ancestry, physical disability, mental disability, medical condition, genetic
23 information, marital status, sex, gender, gender identity, gender expression, age,
24 sexual orientation, or veteran or military status, to harass an employee, an applicant,
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1 an unpaid intern or volunteer, or a person providing services pursuant to a contract.
2 Harassment of an employee, an applicant, an unpaid intern or volunteer, or a person
3 providing services pursuant to a contract by an employee, other than an agent or
4 supervisor, shall be unlawful if the entity, or its agents or supervisors, knows or
5 should have known of this conduct and fails to take immediate and appropriate
6 corrective action. An employer may also be responsible for the acts of nonemployees,
7 with respect to harassment of employees, applicants, unpaid interns or volunteers, or
8 persons providing services pursuant to a contract in the workplace, if the employer, or
9 its agents or supervisors, knows or should have known of the conduct and fails to take
10 immediate and appropriate corrective action. In reviewing cases involving the acts of
11 nonemployees, the extent of the employer's control and any other legal responsibility
12 that the employer may have with respect to the conduct of those nonemployees shall
13 be considered. An entity shall take all reasonable steps to prevent harassment from
14 occurring. Loss of tangible job benefits shall not be necessary in order to establish
15 harassment.”

16
17 188. Plaintiff was subjected to harassment from Defendants SNOOP DOGG,
18 SNOOP DOGG'S LLC, THE BROADUS COLLECTION, LLC, CASA VERDE
19 CAPITAL, LLC, and MERRY JANE EVENTS, INC. after Plaintiff complained of
20 sexual harassment, assault, and battery. Said conduct was severe, pervasive, constant
21 and continuous, and was offensive, humiliating and harassing to Plaintiff and would
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1 have been offensive to a reasonable person under Plaintiff's circumstances.

2 189. When Plaintiff complained of sexual harassment, assault, battery, and
3 retaliation, Defendants SNOOP DOGG, SNOOP DOGG'S LLC, THE BROADUS
4 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
5 EVENTS, INC. subjected Plaintiff to further harassment by releasing her name to the
6 public, threatening Plaintiff with criminal charges, threatening Plaintiff with a lawsuit
7 worth tens of millions of dollars, intimidation, defamation, and retaliation.
8 Defendants took no corrective action and did not redact or retract their statement or
9 threats of a lawsuit and criminal prosecution which resulted in Plaintiff being
10 subjected to continued harassment, threats of criminal charges, intimidation,
11 defamation, and retaliation.
12

13 190. Defendants are responsible for the acts of Defendants' followers who
14 harassed Plaintiff after the release of her name because Defendants knew or should
15 have known of the conduct and failed to take immediate and appropriate corrective
16 action.
17

18 191. As a proximate result of Defendants' conduct, Plaintiff has suffered
19 actual, consequential and incidental financial losses, including without limitation, loss
20 of salary and benefits, and the intangible loss of employment-related opportunities for
21 growth in Plaintiff's field and damage to Plaintiff's professional reputation, all in an
22 amount subject to proof at the time of trial.
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1 192. As a proximate result of the wrongful acts of Defendants, and each of
2 them, Plaintiff has suffered and continues to suffer anxiety, worry, embarrassment,
3 humiliation, mental anguish, and emotional distress and has incurred and will likely
4 incur, medical expenses as a result. Plaintiff will continue to experience said pain and
5 mental and emotional suffering for a period in the future Plaintiff cannot presently
6 ascertain, all in an amount subject to proof at the time of trial.
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9 193. The conduct of Defendants, and each of them, and their agents and
10 employees as described herein, was malicious, fraudulent, and oppressive, and done
11 with a willful and conscious disregard for Plaintiff's rights.
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13 194. As a proximate result of the wrongful acts of Defendants, and each of
14 them, Plaintiff has been forced to hire attorneys to prosecute Plaintiff's claims herein,
15 and has incurred and is expected to continue to incur attorneys' fees and costs in
16 connection therewith. Plaintiff is entitled to recover such attorneys' fees and costs
17 under California Government Code Section 12965(b).
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19
20 195. The acts taken toward Plaintiff were carried out by and/or ratified by
21 Defendants and/or managing agent employees of Defendants acting in a despicable,
22 oppressive, fraudulent, malicious, deliberate, egregious, and inexcusable manner in
23 order to injure and damage Plaintiff, thereby justifying an award to Plaintiff of
24 punitive damages in a sum appropriate to punish and make an example of Defendants,
25 and each of them.
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SEVENTH CAUSE OF ACTION

FOR AIDING AND ABETTING IN VIOLATION OF GOV'T CODE §§ 12940

ET SEQ.

(Against Defendants SNOOP DOGG, SNOOP DOGG'S LLC, THE BROADUS
COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
EVENTS, INC.)

196. Plaintiff incorporates by reference and re-alleges the preceding paragraphs, inclusive, as though set forth fully herein.

197. At all times relevant for purposes of this Complaint, the FEHA, Gov't Code § 12940 et seq., was in full force and effect and binding on Defendants. FEHA states that it is an unlawful employment practice "(i) for any person to aid abet, incite, compel, or coerce the doing of any of the acts forbidden under this part, or to attempt to do so."

198. As such term is used under FEHA, "any of the acts forbidden under this part this part" means or refers to harassment on the bases of one or more of the protected characteristics under FEHA such as sex and gender.

199. Defendants SNOOP DOGG, SNOOP DOGG'S LLC, THE BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE EVENTS, INC. instructed, aided, and/or abetted their spokesperson to release Plaintiff's name to the public and media, an act of severe harassment in itself, thereby

1 further subjecting Plaintiff to harassment.

2 200. Defendants SNOOP DOGG, SNOOP DOGG’S LLC, THE BROADUS
3 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
4 EVENTS, INC. instructed, aided, and/or abetted their attorney to threaten Plaintiff and
5 Plaintiff’s counsel with a lawsuit worth tens of millions of dollars, thereby further
6 subjecting Plaintiff to harassment and retaliation.
7

8
9 201. Defendants aided and abetted their Instagram followers to harass Plaintiff
10 when they released Plaintiff’s name to the public and media.
11

12 202. These laws set forth in the preceding paragraph require Defendants to
13 refrain from harassing, or creating, or maintaining a hostile work environment against
14 an employee based upon Plaintiff’s sex and gender, and for aiding and abetting
15 harassment and retaliation.
16

17 203. Defendants’ harassing conduct was severe and pervasive, was
18 unwelcome by Plaintiff, and a reasonable person in Plaintiff’s circumstances would
19 have considered the work environment to be hostile and abusive.
20

21 204. Defendants violated the FEHA and the public police of the State of
22 California which is embodied in the FEHA by creating a hostile work environment,
23 and by discriminating and harassing Plaintiff because of Plaintiff’s sex and gender.
24

25 205. As a proximate result of the wrongful acts of Defendants, Plaintiff has
26 been harmed in that Plaintiff has suffered actual, consequential and incidental
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1 financial losses, including without limitation loss of salary and benefits, and the
2 intangible loss of employment-related opportunities for growth in Plaintiff's field and
3 damages to Plaintiff's professional reputation, all in an amount subject to proof at the
4 time of trial. Plaintiff claims such amounts as damages together with prejudgment
5 interest pursuant to *Civil Code* Sections 3287 and/or 3288 and/or any other provision
6 of law providing for prejudgment interest.
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9 206. As a proximate result of the wrongful acts of Defendants, and each of
10 them, Plaintiff has suffered and continues to suffer anxiety, worry, embarrassment,
11 humiliation, mental anguish, and emotional distress and has incurred and will likely
12 incur, medical expenses as a result. Plaintiff will continue to experience said pain and
13 mental and emotional suffering for a period in the future Plaintiff cannot presently
14 ascertain, all in an amount subject to proof at the time of trial.
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17 207. The acts taken toward Plaintiff were carried out by and/or ratified by
18 Defendants and/or managing agent employees of Defendants acting in a despicable,
19 oppressive, fraudulent, malicious, deliberate, egregious, and inexcusable manner in
20 order to injure and damage Plaintiff, thereby justifying an award to Plaintiff of
21 punitive damages in a sum appropriate to punish and make an example of Defendants,
22 and each of them.
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EIGHTH CAUSE OF ACTION

**FOR FAILURE TO PREVENT HARASSMENT AND RETALIATION IN
VIOLATION OF FEHA [CAL. GOV'T CODE §12940(K)]**

(Against Defendants SNOOP DOGG'S LLC, THE BROADUS COLLECTION, LLC,
CASA VERDE CAPITAL, LLC, and MERRY JANE EVENTS, INC.)

208. Plaintiff incorporates by reference and re-alleges the preceding paragraphs, as though fully stated herein.

209. At all times relevant for purposes of this Complaint, the FEHA, Gov't Code § 12900 et seq., was in full force and effect and binding on Defendants. FEHA requires Defendants, among other things, "to take all reasonable steps necessary to prevent discrimination and harassment from occurring."

210. In perpetrating the above-described acts and failures to act, Defendants violated California *Government Code* § 12940 by failing to ensure a workplace free of harassment. Defendants are responsible for assuring that DFEH provisions are followed, including provisions prohibiting harassment against employees.

211. In perpetrating the above-described acts and failures to act, Defendants violated California *Government Code* § 12940 by failing to take all reasonable steps necessary to prevent such harassment based on sex from occurring.

212. Instead, Defendants created and fostered a hostile, offensive, inappropriate and intolerable work environment, where harassment was condoned,

1 encouraged, tolerated, sanctioned, and ratified as Defendants allowed Defendant
2 SNOOP DOGG to post the Instagram picture described above, release the statement
3 which contained Plaintiff's full name, and threaten Plaintiff and Plaintiff's counsel
4 with lawsuit worth millions of dollars.
5

6 213. Defendants repeatedly violated Gov't Code § 12940(k). Defendants
7 failed to provide Plaintiff with any sexual harassment training. Additionally,
8 Defendants' acts and failures to act include, but are not limited to, the following:
9

- 10 (a) Having no policies, practices and procedures and/or failing to
11 implement policies, practices and procedures and/or having
12 ineffective policies, practices, and procedures regarding
13 Defendants' obligations to refrain from discrimination and
14 harassment;
15
16 (b) Having no policies, practices and procedures and/or failing to
17 implement policies, practices and procedures and/or having
18 ineffective policies, practices, and procedures regarding the
19 handling of complaints of discrimination and harassment;
20
21 (c) Failing to investigate when discrimination and harassment were
22 reported, despite there being such reports;
23
24 (d) Failing to provide any and/or adequate training, education, or
25 information to their personnel, and most particularly to
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- 1 management and supervisory personnel with regard to policies and
2 procedures regarding preventing discrimination and harassment;
3
4 (e) Failing to appoint a qualified, neutral third party to investigate an
5 employee's allegations;
6
7 (f) Failing to transfer employee to a new supervisor under the same
8 terms and conditions of employment;
9
10 (g) Failing to review the employer's anti-harassment policy with the
11 harasser and imposing counseling or discipline as appropriate; and
12
13 (h) Failing to take permanent remedial steps reasonably calculated to
14 end the current harassment and deter future harassment from the
15 same offender or others.

16 214. As a proximate result of Defendants' conduct, Plaintiff has suffered
17 actual, consequential and incidental financial losses, including without limitation, loss
18 of salary and benefits, and the intangible loss of employment-related opportunities for
19 growth in Plaintiff's field and damage to Plaintiff's professional reputation, all in an
20 amount subject to proof at the time of trial.
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22 215. As a proximate result of the wrongful acts of Defendants, and each of
23 them, Plaintiff has suffered and continues to suffer anxiety, worry, embarrassment,
24 humiliation, mental anguish, and emotional distress and has incurred and will likely
25 incur, medical expenses as a result. Plaintiff will continue to experience said pain and
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1 mental and emotional suffering for a period in the future Plaintiff cannot presently
2 ascertain, all in an amount subject to proof at the time of trial.

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4 216. The conduct of Defendants, and each of them, and their agents and
5 employees as described herein, was malicious, fraudulent, and oppressive, and done
6 with a willful and conscious disregard for Plaintiff's rights.

7
8 217. As a proximate result of the wrongful acts of Defendants, and each of
9 them, Plaintiff has been forced to hire attorneys to prosecute Plaintiff's claims herein,
10 and has incurred and is expected to continue to incur attorneys' fees and costs in
11 connection therewith. Plaintiff is entitled to recover such attorneys' fees and costs
12 under California *Government Code* Section 12965(b).

13
14 218. The acts taken toward Plaintiff were carried out by and/or ratified by
15 Defendants and/or managing agent employees of Defendants acting in a despicable,
16 oppressive, fraudulent, malicious, deliberate, egregious, and inexcusable manner in
17 order to injure and damage Plaintiff, thereby justifying an award to Plaintiff of
18 punitive damages in a sum appropriate to punish and make an example of Defendants,
19 and each of them.
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NINTH CAUSE OF ACTION

FOR DEFAMATION/DEFAMATION PER SE

(Against Defendants SNOOP DOGG, SNOOP DOGG’S LLC, THE BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE EVENTS, INC.)

219. Plaintiff incorporates by reference and re-alleges the preceding paragraphs, as though fully stated herein.

220. The Defamatory Statement to the Press released by Defendants SNOOP DOGG, SNOOP DOGG’S LLC, THE BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE EVENTS, INC. spokesperson were false and unprivileged, were written and published with the goal of threatening, intimidating, retaliating against, and making Plaintiff an object of harassment, ridicule, contempt, hatred, or disgrace, and to bring her public and personal humiliation.

221. Defendants either knew that the spokesperson’s statement were false or were published with reckless disregard as to their truth or falsity.

222. The Defamatory Statements, on their face tend to directly injure Plaintiff in respect to her profession, trade, and business by imputing dishonesty to her, effectively calling her a liar about a matter as deeply personal as having been sexually assaulted and battered.

1 223. As a direct and proximate result of the Defamatory Statement, Plaintiff
2 has suffered and will suffer loss of reputation, shame, mortification, hurt feelings, and
3 severe emotional distress, all to her general damages.
4

5 224. As a further direct and proximate result of the Defamatory Statements,
6 Plaintiff has suffered loss of business contracts, business engagements, and deals and
7 will continue to suffer loss of business in an amount to be prove at trial.
8

9 225. As a result of this damage to her reputation, Plaintiff's business and
10 personal relationships have been, and will continue to be adversely affected.
11

12 226. By engaging in the above willful conduct with reckless disregard of truth
13 or falsity, Defendants acted with actual malice and in reckless and conscious disregard
14 to Plaintiff's rights, entitling her to punitive damages.
15

16
17 **TENTH CAUSE OF ACTION**

18 **FOR FALSE LIGHT**

19
20 (Against Defendants SNOOP DOGG, SNOOP DOGG'S LLC, THE BROADUS
21 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
22 EVENTS, INC.)
23

24 227. Plaintiff incorporates by reference and re-alleges the preceding
25 paragraphs, as though fully stated herein.
26

27 228. Defendants' Defamatory Statement contains numerous false implications
28

1 about Plaintiff, including without limitation:

2 (a) That Plaintiff was part of a “self-enrichment shakedown scheme,”
3 “extort[ed] Snoop Dogg,” “manufactures an occurrence of more than
4 8 years ago,” made “false allegations,” “concoct[ed] a legal
5 complaint,” and that “Mr. Broadus has never had any sexual
6 encounter whatsoever with” Plaintiff. In fact, Plaintiff was sexually
7 assaulted and battered by Plaintiff. Plaintiff is not extorting
8 Defendants and did not “cococt” a “self-enrichment shakedown
9 scheme.” Mr. Broadus, without Plaintiff’s consent and against her
10 will, subjected Plaintiff to sexual assault and battery.

11 229. The unfair and inaccurate depictions of Plaintiff, and the false
12 impressions and implications created by the Defamatory Statements are highly
13 offensive to a reasonable person of ordinary sensibilities in Plaintiff’s position.

14 230. Upon information and belief, members of the community understood that
15 the statements were about Ms. Dickinson as the statements were about, concerning,
16 and mentioned Plaintiff expressly.

17 231. The Defamatory Statements had a natural tendency to injure Plaintiff’s
18 reputation.

19 232. The Defamatory Statements were published by Defendants knowing that
20 they contained unfair and inaccurate depictions of Plaintiff, and false implications that
21

1 would damages Plaintiff's reputation in the community.

2 233. Defendant SNOOP DOGG knows that he sexually assaulted and battered
3 Plaintiff. Defendant SNOOP DOGG knew that by their spokesperson implying that
4 Plaintiff's claims were "concocted" and/or lies put Plaintiff in a false light.
5

6 234. In the alternative, the false implications, and each of them, contained in
7 the Defamatory Statements were published with reckless disregard as to their truth or
8 falsity.
9

10 235. Upon information and belief, the wrongful conduct of Defendants was a
11 substantial factor in causing Plaintiff harm in respect to her profession, trade, and
12 business by imputing dishonesty to her, effectively calling her a liar about a matter as
13 deeply personal as having been sexually assaulted and battered.
14

15 236. As a direct and proximate result of the Defamatory Statement and
16 depiction, Plaintiff has suffered and will suffer loss of reputation, shame,
17 mortification, hurt feelings, and severe emotional distress, and has been, and continues
18 to be, embarrassed and humiliated by the false statements and implications and
19 reasonable fear that she will be shunned, avoided and subjected to ridicule.
20

21 237. Additionally, as a direct and proximate result of the above-described
22 statements and depictions, Plaintiff has suffered and will continue to suffer, significant
23 damage to her reputation and to her livelihood.
24

25 238. Defendants have acted with knowledge that their depictions of Plaintiff
26
27
28

1 were false or with a reckless disregard of truth or falsity. Defendants' conduct was
2 intended by them to cause injury to Plaintiff, and was despicable conduct carried on
3 with a willful and conscious disregard of the rights and reputation of Plaintiff. As
4 such, Plaintiff is entitled to recover punitive damages in an amount sufficient to
5 punish Defendants and deter them from conduct in the future.
6
7

8
9 **ELEVENTH CAUSE OF ACTION**

10 **FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

11
12 (Against Defendants SNOOP DOGG, SNOOP DOGG'S LLC, THE BROADUS
13 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
14 EVENTS, INC.)
15

16 239. The allegations of each of the preceding paragraphs are re-alleged and
17 incorporated herein by reference.

18 240. By engaging in the above-described conduct, which included, but is not
19 limited to, defaming Plaintiff, retaliating against Plaintiff, harassing Plaintiff,
20 threatening Plaintiff with criminal charges and a tens of millions of dollars lawsuit,
21 and releasing Plaintiff's name to Defendants' millions of followers so that they have
22 the ability to threaten, intimidate, harass, and retaliate against Plaintiff, Defendants
23 engaged in extreme and outrages conduct with the intention of causing, or reckless
24 disregard of the probability of causing, emotional distress.
25
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1 241. Plaintiff has suffered and continues to suffer anxiety, worry,
2 embarrassment, humiliation, mental anguish, and severe emotional distress.

3
4 242. Plaintiff's damages were the actual and proximate causation of the
5 emotional distress caused by Defendants' outrageous conduct. Defendants' conduct
6 was reckless and with a conscious disregard of Plaintiff's rights. Plaintiff is therefore
7 entitled to an award of punitive damages against Defendants in an amount to be
8 determined by proof at trial.
9
10

11
12 **TWELFTH CAUSE OF ACTION**

13 **FOR NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

14 (Against Defendants SNOOP DOGG, SNOOP DOGG'S LLC, THE BROADUS
15 COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
16 EVENTS, INC.)
17

18 243. The allegations of each of the preceding paragraphs are re-alleged and
19 incorporated herein by reference.
20

21 244. Plaintiff is informed and believes that knew or should have known that
22 Defendant SNOOP DOGG was retaliating against Plaintiff by posting the Picture on
23 Instagram which threatened Plaintiff with criminal charges, releasing Plaintiff's name
24 through Defendant SNOOP DOGG's spokesperson, and by harassing and defaming
25 Plaintiff.
26
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1 245. Plaintiff is informed and believes that Defendants failed to take
2 appropriate and corrective action against Defendant SNOOP DOGG.
3

4 246. Plaintiff is informed and believes that had Defendants taken prompt and
5 corrective action against Defendant SNOOP DOGG, that Defendant SNOOP DOGG
6 would not have retaliated against Plaintiff. Furthermore, Plaintiff is informed and
7 believes that had Defendants taken prompt and corrective action against Defendant
8 SNOOP DOGG, then Defendant SNOOP DOGG would not have threatened Plaintiff
9 through the Instagram Post and Defamatory Statement made by Defendant SNOOP
10 DOGG's spokesperson.
11

12 247. Defendants, and each of them, owed Plaintiff a duty of care to act in a
13 reasonable and ordinary manner so as not to cause Plaintiff any foreseeable harm.
14

15 248. Defendants, and each of them, failed to use ordinary and reasonable care
16 in order to avoid injury to Plaintiff. This includes, but is not limited to, Defendants
17 subjecting her to further harassment, outing Plaintiff's name, threatening Plaintiff with
18 criminal charges and a million dollar lawsuit, intimidation, defamation, and
19 retaliation.
20

21 249. Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL, and
22 EVENTS released the defamatory statement with the intent and effect of revictimizing
23 Plaintiff, destroying her professional reputation, outing Plaintiff's identity so
24 Defendants' millions of followers can also retaliate, harass, and threaten Plaintiff, and
25
26
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1 subjecting Plaintiff to violence and threats of violence from Defendants' millions of
2 followers and supporters, causing Plaintiff severe emotional distress.

3
4 250. Alternatively, Defendants negligently released the statement with a
5 reckless disregard for Plaintiff's safety by outing Plaintiff's identity so Defendants'
6 millions of followers can also retaliate, harass, and threaten Plaintiff, and subject
7 Plaintiff to violence and threats of violence from Defendants' millions of followers
8 and supporters, causing Plaintiff severe emotional distress.

9
10 251. As a result of Defendants' discriminatory and intolerable treatment and
11 conduct, Plaintiff suffered and continues to suffer from anxiety, worry, mental
12 anguish, loss of sleep, stress, depression, and severe emotional distress.

13
14 252. The conduct of Defendants constitute negligence and is actionable under
15 the laws of the State of California. As a direct and proximate result of the acts of
16 Defendants, Plaintiff has suffered, without limitation, emotional distress, fear,
17 embarrassment, anxiety, shame, humiliation, distress, shock, and severe emotional
18 distress.
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THIRTEENTH CAUSE OF ACTION
FOR UNLAWFUL WHISTLEBLOWER RETALIATION IN VIOLATION OF
CALIFORNIA LABOR Code § 1102.5

(Against Defendants SNOOP DOGG, SNOOP DOGG’S LLC, THE BROADUS
COLLECTION, LLC, CASA VERDE CAPITAL, LLC, and MERRY JANE
EVENTS, INC.)

253. The allegations of each of the preceding paragraphs are re-alleged and incorporated herein by reference.

254. Plaintiff complained to of sexual assault, battery, harassment, and retaliation.

255. Defendants retaliated against Plaintiff for reporting and complaining subjecting her to further harassment, outing Plaintiff’s name, threats of criminal charges, threats of law suit for millions of dollars, intimidation, defamation, and retaliation.

256. Defendants’ conduct was in violation of California Labor Code §1102.5.

257. As a direct and proximate result of Defendants’ retaliatory harassment of Plaintiff, Plaintiff has suffered and continues to suffer damages in the form of lost wages and other employment benefits, and emotional distress, the exact amount of which will be proven at trial.

258. The foregoing conduct engaged in, authorized and ratified by Defendants

1 and each of their directors, officers and/or managing agents, constitutes malice, fraud,
2 and oppression, and was authorized, ratified, and carried on with a conscious and
3 willful disregard of Plaintiff's right to be free from retaliation based on making reports
4 and complaints of sexual assault and battery, so as to justify punitive and exemplary
5 damages in an amount appropriate to punish and make an example of Defendants.
6

7 As a direct and proximate result of the foregoing conduct, Plaintiff is entitled to
8 recover, in addition to the damages alleged above, attorneys' fees and costs pursuant
9 to California Code of Civil Procedure § 1021.5, and prejudgment interest pursuant to
10 California Civil Code §§ 3287, 3288, and 3291.
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15 **PRAYER FOR RELIEF**

16 WHEREFORE, PLAINTIFF prays for judgment as follows:

17 As to All Causes of Action

- 18 1. For general, compensatory, and/or special damages in an amount according
19 to proof for Plaintiff's injuries, mental and/or emotional distress, medical
20 expenses, actual financial losses, consequential financial losses, incidental
21 financial losses, loss of past and future earnings, loss of salary and benefits,
22 and all damages flowing therefrom for an amount to be determined at trial;
23
24 2. For all general and special damages to compensate Plaintiff for an amount to
25 be determined at trial;
26
27
28

3. For punitive damages, as allowed by law, that will sufficiently punish, make an example of, and deter future conduct by Defendants for an amount to be determined at trial;
4. For prejudgment and post-judgment interest according to any applicable provision of law, according to proof for an amount to be determined at trial;
5. For attorney's fees and costs for an amount to be determined at trial;
6. Costs of suit; and
7. For such other and further relief as the Court may deem just and proper.

Dated: March 10, 2022

**DEREK SMITH LAW GROUP,
LLP**

Attorneys for Plaintiff JANE DOE

By: /s/ Matt E.O. Finkelberg

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Los Angeles, CA 90071
(310) 602-6050

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a jury trial on all issues to be tried and all causes of action and claims with respect to which Plaintiff has a right to jury trial.

Dated: March 10, 2022

**DEREK SMITH LAW GROUP,
LLP**
Attorneys for Plaintiff JANE DOE

By: /s/ Matt E.O. Finkelberg
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 10, 2022, I electronically filed the foregoing FIRST AMENDED COMPLAINT FOR MONETARY AND PUNITIVE DAMAGES with the Clerk of the Central District of California using the CM/ECF system, which will send notice of electronic filing to the following:

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Dated: March 10, 2022

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