

DEREK SMITH LAW GROUP, LLP

Matt E.O. Finkelberg, (SBN 329503)

633 West 5th Street, Suite 3250

Los Angeles, CA 90071

Telephone: (310) 602-6050

Facsimile: (310) 602-6350

Email: matt@dereksmithlaw.com

Attorneys for Plaintiff JANE DOE

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; GERBER & CO, INC.; THE BROADUS COLLECTION, LLC; CASA VERDE CAPITAL, LLC; and MERRY JANE EVENTS, INC.;

Defendants.

Case No. 2:22-cv-00900

COMPLAINT FOR MONETARY AND PUNITIVE DAMAGES

1. Trafficking Victims Protection Act 18 U.S. Code § 1591
2. Sexual Battery
3. Sexual Assault

DEMAND FOR JURY TRIAL

1 Plaintiff, Jane Doe, by and through her attorneys, Derek Smith Law Group,
2 LLP, hereby complains of Defendants CALVIN BROADUS AKA “SNOOP DOGG”,
3 individually; DONALD CAMPBELL AKA “BISHOP DON MAGIC JUAN”,
4 individually; GERBER & CO, INC.; THE BROADUS COLLECTION, LLC; CASA
5 VERDE CAPITAL, LLC; and MERRY JANE EVENTS, INC. upon information and
6
7 belief, as follows:
8

9
10 **NATURE OF THE CASE**

11 1. Plaintiff brings this action charging Defendants violated Plaintiff’s rights
12 pursuant to, inter alia, Trafficking Victims Protection Act 18 U.S. Code § 1591, and
13 laws of the State of California, based upon the supplemental jurisdiction of this Court
14 pursuant to *United Mine Workers of America v. Gibbs*, 383 U.S. 715 (1966) and 28
15 U.S.C. §1367, seeking damages to redress the injuries Plaintiff suffered as a result of
16
17 being sexually assaulted and battered.
18

19
20 **JURISDICTION AND VENUE**

21 2. Jurisdiction of this action is conferred upon this Court as this case
22 involves a Federal Question under 18 U.S. Code § 1591. The Court also has
23 jurisdiction pursuant to 29 U.S.C. §2617; 28 U.S.C. §1331, §1343 and pendent
24
25 jurisdiction thereto.
26
27
28

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

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

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

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

22 **THE PARTIES**

23
24 7. At all times relevant for purposes of this Complaint, Plaintiff, JANE
25 DOE (“Plaintiff”) has been a resident of the State of California.
26
27
28

1 8. Plaintiff is a sexual assault victim and is identified herein as JANE DOE.
2 Please see *Doe v. Blue Cross & Blue Shield United of Wisc.*, 112 F.3d 869, 872 (7th
3 Cir.1997) (“fictitious names are allowed when necessary to protect the privacy of ...
4 rape victims, and other particularly vulnerable parties or witnesses”). Additionally,
5 “the public generally has a strong interest in protecting the identities of sexual assault
6 victims so that other victims will not be deterred from reporting such crimes.” *Doe*
7 *No. 2 v. Kolko*, 242 F.R.D. 193, 195 (E.D.N.Y.2006); *see also Doe v. Evans*, 202
8 F.R.D. 173, 176 (E.D.Pa.2001) (granting anonymity to sexual assault victim). *Doe v*
9 *Penzato*, CV10-5154 MEJ, 2011 WL 1833007, at *3 [ND Cal May 13, 2011]

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

21 10. At all times material, Defendant SNOOP DOGG’S LLC (“SNOOP”) was
22 and is a corporation doing business in the State of California, with their principal
23 place of business located at 1880 Century Park East #200, Los Angeles, CA 90067.
24 Defendant SNOOP held supervisory authority over Plaintiff, controlling various
25 tangible aspects of Plaintiff’s employment, including the ability to hire and fire
26 Plaintiff.
27 Plaintiff.
28 Plaintiff.

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

9 12. At all times material, Defendant CASA VERDE CAPITAL, LLC
10 (“CAPITAL”) was and is a corporation doing business in the State of California, with
11 their principal place of business located at 750 N San Vicente Blvd. #800, West
12 Hollywood, CA 90069. Defendant CAPITAL held supervisory authority over
13 Plaintiff, controlling various tangible aspects of Plaintiff’s employment, including the
14 ability to hire and fire Plaintiff.
15

17 13. At all times material, Defendant MERRY JANE EVENTS, INC.
18 (“EVENTS”) was and is a corporation doing business in the State of California, with
19 their principal place of business located at 2058 N Mills Ave #441, Claremont, CA
20 91711. Defendant EVENTS held supervisory authority over Plaintiff, controlling
21 various tangible aspects of Plaintiff’s employment, including the ability to hire and
22 fire Plaintiff.
23

25 14. At all times material, Defendant CALVIN BROADUS AKA “SNOOP
26 DOGG” (“SNOOP DOGG”) was and is the Owner of Defendants GERBER, SNOOP,
27 COLLECTION, CAPITAL, and EVENTS. Defendant SNOOP DOGG held
28

1 supervisory authority over Plaintiff, controlling various tangible aspects of Plaintiff's
2 employment including the ability to hire and fire Plaintiff.

3
4 15. At all times material, Defendant DONALD CAMPBELL AKA
5 "BISHOP DON MAGIC JUAN" ("CAMPBELL") was and is the Spiritual Advisor,
6 employee, agent, representative, and servant for Defendants SNOOP DOGG, SNOOP
7 DOGG'S LLC; THE BROADUS COLLECTION, LLC; CASA VERDE CAPITAL,
8 LLC; MERRY JANE EVENTS, INC.; and GERBER.

9
10 16. Each DEFENDANT sued in this action acts and acted, in all respects
11 pertinent to this action, as the agent of the other DEFENDANTS, carried out a joint
12 scheme, business plan or policy in all respects pertinent hereto, and that the acts of
13 each DEFENDANT are legally attributable to the other DEFENDANTS
14

15
16 17. Under California law, Defendants are jointly and severally liable as
17 employers for the violations alleged herein because they have each exercised
18 sufficient control over Plaintiff. Each Defendant had the power to hire and fire
19 Plaintiff, supervise and control Plaintiff's work schedule and/or conditions of
20 employment, determine Plaintiff's rate of pay, and maintain Plaintiff's employment
21 records. Defendants suffer or permit Plaintiff to work and/or "engage" Plaintiff so as
22 to create a common law employment relationship. As joint employers of Plaintiff,
23 Defendants are jointly and severally liable for all relief available to Plaintiff under the
24 law.
25
26
27
28

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

3
4 19. Defendants were Plaintiff's joint employers and/or prospective
5 employers.

6
7
8 **FACTS COMMON TO ALL CAUSES OF ACTION**

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

11
12 21. Throughout Plaintiff's career, Plaintiff has worked as a professional
13 dancer, model, actress, host, and spokesmodel for Muse Ink Festival, Comedy Central,
14 and CNN.

15
16 22. For several years, Plaintiff worked for and performed with Defendant
17 SNOOP DOGG, Defendant CAMPBELL, and other rappers who toured with
18 Defendant SNOOP DOGG such as Weston Frye, Lil' Nate Dogg, Kurrup, Sugar
19 Free, and Warren G.

20
21 23. Defendants SNOOP DOGG and CAMPBELL employed Plaintiff as a
22 dancer on stage as part of their concerts.

23
24 24. Plaintiff obtained exposure as a Dancer for Defendants which allowed
25 Plaintiff to obtain sponsorships, modeling jobs, and event hosting.

26
27 25. Defendant CAMPBELL would tell Plaintiff, "*Snoop wants you here,*"
28 "*This will make you go viral,*" and "*This is for your career.*"

1 26. In addition to this, Plaintiff received gifts from Defendant SNOOP
2 DOGG, CAMPBELL, other rappers, and sponsors in exchange for performing on
3 stage and dancing with them at their shows.
4

5
6 **Defendant SNOOP DOGG's History of Sexual Abuse, Harassment, Threatening**
7
8 **of Females, and Retaliation**

9 27. Defendant SNOOP DOGG has a long history of sexually abusing
10 women, retaliating against and threatening them when they complain, and terminating
11 employees who object to his unlawful conduct.
12

13 28. This history demonstrates a continuous pattern of sexual abuse, reckless
14 indifference for the rights of others, and retaliatory threats and conduct when others
15 object to unlawful conduct. This information further supports punitive damages and is
16 admissible under F.R.E. 415. It also demonstrates that in keeping with SNOOP
17 DOGG's pattern of conduct, he is likely to retaliate against and possibly harm Plaintiff
18 JANE DOE for her opposition to his sexual assault. This is another reason for
19 Plaintiff's anonymity. Furthermore, to the extent SNOOP DOGG takes any retaliatory
20 action against Plaintiff JANE DOE, Plaintiff hereby claims retaliation for exercising
21 her rights as stated herein. It is anticipated that SNOOP DOGG will sue Plaintiff
22 JANE DOE for extortion just as he did to Kylie Bell in an effort to intimidate her.
23 Plaintiff claims unlawful retaliation in the event of such lawsuit.
24
25
26
27
28

1 29. Defendant SNOOP DOGG refers to himself as a “Pimp.” In an interview
2 with *Rolling Stone*, Defendant SNOOP DOGG said that in 2003, “***I put an***
3 ***organization together. I did a Playboy tour, and I had a bus follow me with ten***
4 ***bitches on it. I could fire a bitch, fuck a bitch, get a new ho: it was my program.***
5 ***City to city, titty to titty, hotel room to hotel room, athlete to athlete, entertainer to***
6 ***entertainer...I get a couple of their players to come hang out, pick and choose, and***
7 ***whichever one you like comes with a number. A lot of athletes bought puss from***
8 ***me...I dreamed of being a pimp.***”

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

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

23
24 32. Around January of 2014, three of Defendant SNOOP DOGG’s
25 bodyguards complained that they were not being paid for overtime in violation of
26
27
28

1 California labor code. Defendant SNOOP DOGG terminated them in retaliation for
2 their complaints.

3
4 33. Defendant SNOOP DOGG’s threatened female rapper, Iggy Azalea, by
5 saying, “*Now I said what I said bitch now let it go before I go all in on ya pink punk*
6 *ass yeah u bitch!!*,” and “*Say Bitch. You're fucking with the wrong n**ga! And*
7 *your n**ga betta check you before I do. You fucking bitch. Yeah, you fucking*
8 *cunt.*”

9
10 34. Around February of 2020, after an interview in which female CBS News
11 Anchor, Gayle King, discussed the sexual allegations against Kobe Bryant, Defendant
12 SNOOP DOGG threatened Ms. King’s safety by saying, “*I wanna call you*
13 *one...Funky, dog-haired bitch, how dare you try and tarnish my motherfucking*
14 *homeboy’s reputation, punk motherfucker...Respect the family and back off bitch,*
15 *before we come get you.*”

16
17 35. In response to the allegations made against Bill Cosby for rape, drug-
18 facilitated sexual assault, sexual battery, and child sexual assault spanning over
19 decades, Defendant SNOOP DOGG posted a picture on his Instagram account in
20 which he said, “*Free bill Cosby.*”

21
22 36. Throughout Defendant SNOOP DOGG’s career, he opened his concerts
23 by saying, “*Girls. Do you want me to make you famous? Then get down on both*
24 *knees, bitch.*”

1 37. As can be seen from the above, Defendant SNOOP DOGG engages in a
2 pattern and practice of sexually assaulting women, threatening women, and retaliating
3 against those who oppose unlawful behavior.
4

5 38. The following public background on Defendant SNOOP DOGG is
6 further evidence on why Plaintiff should be allowed to proceed as a JANE DOE. The
7 following public background is also relevant as to why Plaintiff did not fight
8 Defendant SNOOP DOGG when he sexually assaulted her. It is also relevant to
9 Plaintiff's claim of estoppel with regard to certain Statutes of Limitations out of fear
10 of coming forward. Plaintiff claims estoppel with regard to certain Statutes of
11 Limitations in light of unconscionable acts that deterred her from filing claims as
12 required to state theory of estoppel. Bianco v Warner, 221CV03677FLAMARX, 2021
13 WL 4840470 [CD Cal Oct. 7, 2021]
14
15
16

17 39. Lastly, it is evidence of Defendant SNOOP DOGG's reckless disregard
18 for others and going to his credibility:
19

- 20 • Defendant Snoop Dogg was arrested and charged with the murder of a
21 member of a rival gang who was allegedly shot and killed by Snoop
22 Dogg's bodyguard. Defendant Snoop Dogg was purportedly driving the
23 vehicle from which the gun was fired.
24
- 25 • In July 1993, Defendant Snoop Dogg was stopped for a traffic violation
26 and a firearm was found by police during a search of his car.
27
28

- 1 • In February 1997, Defendant Snoop Dogg pleaded guilty to possession of
2 a handgun.
- 3
- 4 • Defendant Snoop Dogg was arrested in October 2006 at Bob Hope
5 Airport in Burbank after being stopped for a traffic infraction. He was
6 arrested for possession of a firearm and for suspicion of transporting an
7 unspecified amount of marijuana, according to a police statement.
- 8
- 9
- 10 • The following month, after taping an appearance on *The Tonight Show*
11 *with Jay Leno*, he was arrested again for possession of marijuana, cocaine
12 and a firearm. Two members of Snoop's entourage, according to the
13 Burbank police statement, were admitted members of the Rollin 20's
14 Crips gang, and were arrested on separate charges.
- 15
- 16
- 17 • In April 2007, he was given a three-year suspended sentence, five years'
18 probation, and 800 hours of community service after pleading no
19 contest to two felony charges of drug and gun possession by a convicted
20 felon.
- 21
- 22
- 23 • On April 26, 2006, Snoop Dogg and members of his entourage were
24 arrested after being turned away from British Airways' first class lounge
25 at Heathrow Airport in London, England. Snoop and his party were
26 denied entry to the lounge due to some members flying in economy class.
27
28

1 After being escorted outside, the group got in a fight with the police and
2 vandalized a duty-free shop. Seven police officers were injured during
3 the incident.
4

5
6
7 **Snoop Dogg’s Sexual Assault On Plaintiff**

8 40. Around May 29, 2013, Plaintiff JANE DOE and her friend attended one
9 of Defendant SNOOP DOGG’s shows at Club Heat Ultra Lounge, a night club in
10 Anaheim, CA. While at the show Plaintiff and her friend entered the VIP room where
11 they ran into Defendant CAMPBELL.
12

13 41. By way of background, Defendant CAMPBELL is a former “Pimp” and
14 creates fear in women. Defendant CAMPBELL, referred to the “girls” who “worked”
15 for him that “got out of line,” by stating, “*You have to create fear in that female.*
16 *You have to tell her that if she do something wrong that you going to kill her. And*
17 *you have to instill this into her to when she do something wrong, and you whooping*
18 *her and checking her, that she says to you, ‘Daddy, Please don’t kill me like you*
19 *said you was.’” Defendant CAMPBELL is Defendant SNOOP DOGG’s “Spiritual*
20 *Advisor.”*
21

22
23
24 42. That night, Defendant CAMPBELL invited Plaintiff and Plaintiff’s friend
25 to go back to Defendant SNOOP DOGG’s studio with Defendants CAMPBELL and
26 SNOOP DOGG. Plaintiff and Plaintiff’s friend agreed and went with Defendants
27 CAMPBELL and SNOOP DOGG.
28

1 43. Later that same night, Plaintiff's friend left around midnight, leaving
2 Plaintiff alone with Defendants CAMPBELL and SNOOP DOGG. Defendant
3 CAMPBELL offered to Plaintiff, "I can take you home or I can take you back to my
4 place with me." Plaintiff asked Defendant CAMPBELL to drop her off at her home.
5

6 44. Shortly thereafter, Plaintiff left with Defendant CAMPBELL and fell
7 asleep in the car. When Plaintiff awoke, Plaintiff was still in the car with Defendant
8 CAMPBELL. After a short time, Plaintiff and Defendant CAMPBELL arrived at
9 Defendant CAMPBELL's home despite Plaintiff's request that she be dropped off at
10 her home. Plaintiff was exhausted and fell asleep at Defendant CAMPBELL's home.
11

12 45. Around 4:00 AM the next morning, Plaintiff awoke to Defendant
13 CAMPBELL turning Plaintiff to face Defendant CAMPBELL. Defendant
14 CAMPBELL removed his penis from his pants and forced his penis in Plaintiff's face.
15 Defendant CAMPBELL repeatedly shoved his penis into Plaintiff's mouth.
16 Defendant CAMPBELL's penis was flaccid as he was forcing his penis into Plaintiff's
17 mouth. After some time, Defendant CAMPBELL turned away from Plaintiff leaving
18 her alone.
19

20 46. Defendant CAMPBELL discriminated against and harassed Plaintiff
21 because of Plaintiff's sex and gender.
22

23 47. Defendant CAMPBELL sexually harassed, sexually assaulted, and
24 sexually battered Plaintiff.
25
26
27
28

1 48. Subsequently, Defendant CAMPBELL told Plaintiff, “***Here, put this***
2 ***dress on.***” Plaintiff was not feeling well, and replied, “***Can’t I sleep? I don’t feel***
3 ***well.***” Defendant CAMPBELL insisted, “***Put the dress on***”, “***let’s go to Snoop’s***
4 ***videotaping. I want to see if he will make you the weather girl,***” and “***C’mon Snoop***
5 ***wants you there.***” Defendant CAMPBELL urged Plaintiff, “***Snoop wants you there.***
6 ***Let’s go. This is a career move.***” Plaintiff complied in hopes of advancing her career.
7

9 49. Plaintiff and Defendant CAMPBELL arrived at the recording studio
10 where Defendant SNOOP DOGG filmed his television series, *Snoop Dogg’s Double*
11 *G News Network*. While waiting for production to begin, Plaintiff observed the view
12 out the window when Plaintiff made eye contact with Defendant SNOOP DOGG in a
13 window across the way. Defendant SNOOP DOGG leered at Plaintiff, undressing her
14 with his eyes.
15

17 50. Shortly thereafter, Plaintiff had a stomachache and went to the bathroom.
18 While Plaintiff was on the toilet, Defendant SNOOP DOGG opened the door to the
19 bathroom while Plaintiff was on the toilet. He then shut the door with him between the
20 door and Plaintiff on the toilet. Standing with his crotch in Plaintiff’s face, while
21 Plaintiff was defecating on the toilet, Defendant SNOOP DOGG removed his penis
22 from his pants and grabbed Plaintiff’s shoulder, and ordered Plaintiff, “***Put it in your***
23 ***mouth.***” Plaintiff was panicked and terrified. She further recalled Defendant SNOOP
24 DOGG’s criminal history including his alleged gang affiliation and previous rape
25
26
27
28

1 allegations, and reluctantly complied with Defendant SNOOP DOGG afraid for her
2 safety and for her life.

3
4 51. After a few minutes, Defendant SNOOP DOGG withdrew his penis from
5 Plaintiff's mouth, visibly unsatisfied with Plaintiff's reluctance and disgust of being
6 forced to engage in oral sex with Defendant SNOOP DOGG, Defendant SNOOP
7 DOGG proceeded to masturbate and ejaculated on Plaintiff's upper chest and lower
8 neck. Defendant SNOOP DOGG stated, "*I'll be back, I'll get you something to clean*
9 *up with*" and left the bathroom. Defendant SNOOP DOGG never returned. He left
10 Plaintiff there humiliated, terrified and panicked.

11
12
13 52. Defendant SNOOP DOGG sexually harassed, sexually assaulted, and
14 sexually battered Plaintiff.

15
16 53. Defendant SNOOP DOGG subjected Plaintiff to *quid pro quo*
17 harassment.

18
19 54. Defendant SNOOP DOGG's actions were sexually predatory. Plaintiff
20 found herself thinking about her job security if she displeased Defendant SNOOP
21 DOGG. Plaintiff felt pressured by Defendant SNOOP DOGG due to his dominance,
22 and his position of power over her, including his ability to hire and fire her and ensure
23 that she would never be hired in his industry again.

24
25 55. Defendant SNOOP DOGG sexually assaulted and sexually battered
26 Plaintiff.

1 56. Shortly thereafter, Plaintiff, shocked, embarrassed, abandoned, and
2 dejected, cleaned herself off in the bathroom sink and exited the bathroom. Plaintiff
3 turned right and locked eyes with Defendant SNOOP DOGG who, once again, leered
4 at Plaintiff. Plaintiff feared for her life and job security and walked away.

5
6 57. Shortly thereafter, Defendant CAMPBELL spotted Plaintiff wandering
7 the studio and waved her over to Defendants CAMPBELL and SNOOP DOGG.
8 Defendant CAMPBELL insisted, “*Come here! Take a picture with Snoop!*” Plaintiff,
9 mortified and fearing for her safety, walked over to Defendant SNOOP DOGG and
10 stood next to him for a picture. Defendant CAMPBELL took a picture of Plaintiff
11 with Defendant SNOOP DOGG before removing her out from the studio.

12
13
14 58. Defendant SNOOP DOGG failed to hire Plaintiff because Plaintiff
15 refused to willingly and enthusiastically give oral sex to Defendant SNOOP DOGG.

16
17 59. Defendants SNOOP DOGG and CAMPBELL abused their power as
18 Plaintiff’s superiors and sexually assaulted and battered Plaintiff.

19
20 60. Plaintiff felt emotionally overwhelmed, anxious and violated.

21 61. Defendants’ actions and conduct were directed at intentionally harming
22 Plaintiff.

23
24 62. As a result of the Defendants’ discriminatory and intolerable treatment of
25 Plaintiff, Plaintiff has suffered anxiety, stress, depression, nightmares, sleep
26 disturbances, post-traumatic stress, headaches, severe emotional distress and physical
27 ailments.
28

1 63. Defendants sexually harassed, assaulted, and battered Plaintiff.

2 64. Defendants engaged in *quid pro quo* sexual harassment.

3
4 65. Defendants SNOOP DOGG and CAMPBELL discriminated against and
5 harassed Plaintiff because of Plaintiff's sex and gender; retaliated against Plaintiff for
6 refusing to engage in a sexually intimate relationship and failed to hire Plaintiff.
7

8 66. Defendants SNOOP DOGG, SNOOP, COLLECTION, CAPITAL,
9 EVENTS and GERBER sexually harassed, sexually assaulted, and sexually battered
10 Plaintiff.
11

12 67. Around December 20, 2021, Plaintiff obtained a Right to Sue from the
13 Department of Fair Employment and Housing against Defendants SNOOP DOGG,
14 CAMPBELL, SNOOP, COLLECTION, CAPITAL, and EVENTS.
15

16 68. Plaintiff and Defendants agreed to attempt to resolve this dispute through
17 a private mediation which took place on February 8, 2022 and finished early in the
18 morning on February 9, 2022.
19

20 69. The mediation was unsuccessful. Immediately after the mediation ended,
21 and in direct retaliation for Plaintiff's complaints of sexual assault and sexual battery,
22 Defendant SNOOP DOGG posted the below image on his Instagram, calling Plaintiff
23 a "***Gold digger***," while including emoji's of a judge and police officer, obviously
24 threatening Plaintiff that he will take similar action against Plaintiff that Defendant
25 SNOOP DOGG did with Ms. Bell.
26
27
28

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



70. Defendants disparately treated, disparately impacted, harassed and discriminated against Plaintiff because of Plaintiff’s sex and gender; subjected Plaintiff to a hostile work environment and sexual harassment; failed to hire and retaliated against Plaintiff because of Plaintiff’s sex and gender, and because Plaintiff failed to willingly and enthusiastically participate in the oral sexual rape of Plaintiff.

71. As a result of Defendants’ discriminatory and intolerable treatment, Plaintiff suffered and continues to suffer from anxiety, loss of sleep, stress, and severe emotional distress.

72. Because of the acts and conduct complained of herein, Plaintiff has suffered and will continue to suffer the loss of income, bonuses, benefits, and other compensation, which such employment entails. Plaintiff has also suffered pecuniary

1 losses, emotional pain, suffering, inconvenience, loss of enjoyment of life, and other
2 non-pecuniary losses.

3
4 73. As Defendants' conduct has been malicious, willful, outrageous, and
5 conducted with full knowledge of the law, Plaintiff demands Punitive Damages
6 against Defendants.

7
8 74. Plaintiff claims a continuous practice of discrimination and claims a
9 continuing violation and makes all claims herein under the continuing violations
10 doctrine.

11
12 75. Plaintiff further claims aggravation, activation, and/or exacerbation of
13 any preexisting conditions as a result of Defendants' discriminatory conduct.

14 76. Plaintiff claims actual discharge and wrongful termination.

15
16 77. Plaintiff claims alternatively (in the event Defendant Claims so or that
17 the Court determines) that Plaintiff is an Independent Contractor, and Plaintiff makes
18 all applicable claims for the above conduct and facts under the applicable laws
19 pertaining to Independent Contractors. Furthermore, in such, case, Plaintiff claims
20 that Defendant owed and breached its duty to Plaintiff to prevent the
21 harassment/discrimination/retaliation and is liable therefore for negligence.
22

23
24 78. Plaintiff claims that Defendants sexually harassed, assaulted, and battered
25 Plaintiff, created a hostile work environment for Plaintiff, unlawfully discriminated
26 against Plaintiff, disparately treated Plaintiff, disparately impacted Plaintiff, and
27 retaliated against Plaintiff because of Plaintiff's sex and gender.
28

FIRST CAUSE OF ACTION

FOR TRAFFICKING VICTIMS PROTECTION ACT (TVPA)

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

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

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

81. 18 USC § 1591. Sex trafficking of children or by force, fraud, or coercion states as follows:

(a) Whoever knowingly--

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

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

- 1 **(b)** The punishment for an offense under subsection (a) is--
- 2 **(1)** if the offense was effected by means of force, threats of force, fraud, or
- 3 coercion described in subsection (e)(2), or by any combination of such means,
- 4 or if the person recruited, enticed, harbored, transported, provided, obtained,
- 5 advertised, patronized, or solicited had not attained the age of 14 years at the
- 6 time of such offense, by a fine under this title and imprisonment for any term of
- 7 years not less than 15 or for life; or
- 8 **(2)** if the offense was not so effected, and the person recruited, enticed,
- 9 harbored, transported, provided, obtained, advertised, patronized, or solicited
- 10 had attained the age of 14 years but had not attained the age of 18 years at the
- 11 time of such offense, by a fine under this title and imprisonment for not less
- 12 than 10 years or for life.
- 13 **(c)** In a prosecution under subsection (a)(1) in which the defendant had a
- 14 reasonable opportunity to observe the person so recruited, enticed, harbored,
- 15 transported, provided, obtained, maintained, patronized, or solicited, the
- 16 Government need not prove that the defendant knew, or recklessly disregarded
- 17 the fact, that the person had not attained the age of 18 years.
- 18 **(d)** Whoever obstructs, attempts to obstruct, or in any way interferes with or
- 19 prevents the enforcement of this section, shall be fined under this title,
- 20 imprisoned for a term not to exceed 25 years, or both.
- 21 **(e)** In this section:
- 22 **(1)** The term “abuse or threatened abuse of law or legal process” means the use
- 23 or threatened use of a law or legal process, whether administrative, civil, or
- 24 criminal, in any manner or for any purpose for which the law was not designed,
- 25 in order to exert pressure on another person to cause that person to take some
- 26 action or refrain from taking some action.
- 27 **(2)** The term “coercion” means--
- 28 **(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

1 continue performing commercial sexual activity in order to avoid incurring that
2 harm.

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

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

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

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

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

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

19 (1) 10 years after the cause of action arose; or

20 (2) 10 years after the victim reaches 18 years of age, if the victim was a minor
21 at the time of the alleged offense.

22 83. Broad, expansive language is employed in Trafficking Victims Protection
23 Act (TVPA) and its remedial provision, which permits civil actions for damages under
24 TVPA. *Noble v Weinstein*, 335 F Supp 3d 504 [SDNY 2018], mot to certify appeal
25 denied, 17-CV-09260 (AJN), 2019 WL 3940125 [SDNY Aug. 5, 2019]

26 84. Defendants subjected Plaintiffs to commercial sex acts by force and
27 coercion, including both physical and financial.

28 85. 18 U.S.C. 1591 § (e)(3) defines a “commercial sex act” as “any sex act,
on account of which anything of value is given to or received by any person.”

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

14 87. Defendants conditioned Plaintiff’s employment, on Defendants’ ability to
15 continue to sexually assault and engage in forced sex acts. Additionally, the financial
16 aspect to the relationship was also an element of the “forced” sex acts.
17

18 88. Defendants knowingly recruited, enticed, harbored, and/or obtained
19 Plaintiff through means of force, threats of force, and by a combination of such
20 forceful means, and forcibly caused Plaintiff to engage in an unwanted sexual act for a
21 commercial benefit.
22

23 89. 18 USC 1594 further provides liability for “Whoever conspires with
24 another to violate section 1591” Defendants further conspired to violate 1591 as stated
25 herein.
26
27
28

1 90. 18 USC 1594 further states that it shall be unlawful for anyone who
2 “obstructs, attempts to obstruct, or in any way interferes with or prevents the
3 enforcement of this section.” Assuming Defendants take such retaliatory action as
4 stated above, Plaintiff makes a claim for such.

6 91. Defendants are liable to Plaintiffs under 18 USCA § 1591, 1594 and
7
8 1595.

9
10
11 **SECOND CAUSE OF ACTION**
12 **FOR SEXUAL BATTERY**

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

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

18 93. As described herein above, Defendants SNOOP DOGG and
19
20 CAMPBELL caused, and intended to cause, imminent apprehension of a harmful and
21 offensive contact with an intimate part of another. In doing these acts, Defendants
22 SNOOP DOGG and CAMPBELL caused, and intended to cause, imminent
23 apprehension of a harmful and offensive contact with Plaintiff, in violation of, inter
24 alia, Civil Code section 1708.5, and related laws. At no time did Plaintiff consent to
25
26 any of the acts of Defendants SNOOP DOGG and CAMPBELL described herein.
27
28

1 94. As a result of Defendants SNOOP DOGG and CAMPBELL's conduct,
2 Plaintiff was placed in apprehension and fear for her physical well-being.

3
4 95. Defendants SNOOP DOGG and CAMPBELL's sexual battery involved
5 actual physical contact.

6 96. Defendants SNOOP DOGG and CAMPBELL did the aforementioned
7 acts with the intent to cause a harmful or offensive contact with an intimate part of
8 Plaintiff's person and would offend a reasonable sense of personal dignity. Further,
9 said acts did cause a harmful or offensive contact with an intimate part of Plaintiff's
10 person that would offend a reasonable sense of personal dignity.

11
12 97. Because of Defendants SNOOP DOGG and CAMPBELL's position of
13 authority over Plaintiff, and Plaintiff's mental and emotional state, Plaintiff was unable
14 to, and did not, give legal consent to such acts.

15
16 98. As a direct, legal and proximate result of the acts of Defendants SNOOP
17 DOGG and CAMPBELL, Plaintiff sustained serious and permanent injuries to her
18 person, all of her damage in an amount to be shown according to proof and within the
19 jurisdiction of the Court.

20
21 99. Defendants SNOOP DOGG, CAMPBELL, SNOOP DOGG'S LLC, THE
22 BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, MERRY JANE
23 EVENTS, INC., and GERBER knew or should have known, of the assaults and
24 batteries, but ratified the conduct, as described herein above, by failing to adequately,
25 or at all take remedial steps against Defendants SNOOP DOGG and CAMPBELL,
26
27
28

1 refusing to intervene to protect Plaintiff, among other acts of ratification. As
2 Plaintiff's employers and by ratifying Defendants SNOOP DOGG and CAMPBELL's
3 misconduct, Defendants SNOOP DOGG, CAMPBELL, SNOOP DOGG'S LLC, THE
4 BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, MERRY JANE
5 EVENTS, INC., and GERBER are liable to Plaintiff for battery and assault.
6

7
8 100. As a proximate result of the wrongful acts of Defendants, and each of
9 them, Plaintiff has been harmed in that Plaintiff has suffered actual, consequential and
10 incidental financial losses, including without limitation loss of salary and benefits, and
11 the intangible loss of employment-related opportunities for growth in her field and
12 damage to her reputation, all in an amount subject to proof at the time of trial. Plaintiff
13 claims such amounts as damages together with prejudgment interest pursuant to Civil
14 Code sections 3287 and/or 3288 and/or any other provision of law providing for
15 prejudgment interest.
16

17
18 101. As a proximate result of the wrongful acts of Defendants, and each of
19 them, Plaintiff has suffered and continues to suffer anxiety, worry, embarrassment,
20 humiliation, mental anguish, and emotional distress. Plaintiff has further experienced
21 other physical symptoms arising from the wrongful acts of Defendants, and each of
22 them. Plaintiff will continue to experience said pain and physical and emotional
23 suffering for a period in the future she cannot presently ascertain, all in an amount
24 subject to proof at the time of trial.
25
26
27
28

1 102. The acts taken toward Plaintiff were carried out by and/or ratified by
2 Defendants and/or managing agent employees of Defendants acting in a despicable,
3 oppressive, fraudulent, malicious, deliberate, egregious, and inexcusable manner
4 pursuant to California Civil Code Section 3294, in order to injure and damage
5 Plaintiff, thereby justifying an award to them of punitive damages in a sum
6 appropriate to punish and make an example of Defendants, and each of them.
7
8

9
10 **THIRD CAUSE OF ACTION**

11 **FOR SEXUAL ASSAULT**

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

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

18 104. Defendants SNOOP DOGG and CAMPBELL committed overt acts of
19 sexual abuse, assault, and battery against Plaintiff.
20

21 105. Defendants SNOOP DOGG and CAMPBELL intended to inflict a
22 harmful or offensive conduct against Plaintiff and intended to cause Plaintiff to fear
23 such contact. Defendants SNOOP DOGG and CAMPBELL knew that the
24 consequence of an offensive contact was certain to result, as Defendants SNOOP
25 DOGG and CAMPBELL's sexual abuse was intentionally inflicted.
26
27
28

1 106. Defendants SNOOP DOGG and CAMPBELL’s actions placed Plaintiff
2 in apprehension of an immediate harmful or offensive contact.

3
4 107. Plaintiff did not consent to Defendants SNOOP DOGG and
5 CAMPBELL’s harmful or offensive contact with Plaintiff’s person, or to Defendant
6 SNOOP DOGG and CAMPBELL’s conduct, putting Plaintiff in imminent
7 apprehension of such contact.
8

9 108. In doing the things herein alleged, Defendants SNOOP DOGG and
10 CAMPBELL violated Plaintiff’s right under California Civil Code § 43 of protection
11 from bodily restraint or harm, and from personal insult. In doing the things herein
12 alleged, Defendants SNOOP DOGG and CAMPBELL violated their duty, pursuant to
13 California Civil Code §1708, to abstain from injuring the person of Plaintiff or
14 infringing upon her rights.
15
16

17 109. Under the Code of Civil Procedure Section 340.16, “In any civil action
18 for recovery of damages suffered as a result of sexual assault, where the assault
19 occurred on or after the plaintiff’s 18th birthday, the time for commencement of the
20 action shall be the later of the following: (1) Within 10 years from the date of the last
21 act, attempted act, or assault with the intent to commit an act, of sexual assault by the
22 defendant against the plaintiff.”
23
24

25 110. Plaintiff claims estoppel with regard to certain Statutes of Limitations in
26 light of unconscionable acts that deterred her from filing claims as required to state
27
28

1 theory of estoppel. Bianco v Warner, 221CV03677FLAMARX, 2021 WL 4840470
2 [CD Cal Oct. 7, 2021]

3
4 111. Defendants SNOOP DOGG, CAMPBELL, SNOOP DOGG'S LLC, THE
5 BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, MERRY JANE
6 EVENTS, INC., and GERBER knew or should have known, of the assaults and
7
8 batteries, but ratified the conduct, as described herein above, by failing to adequately,
9 or at all take remedial steps against Defendants SNOOP DOGG and CAMPBELL,
10 refusing to intervene to protect Plaintiff, among other acts of ratification. As
11 Plaintiff's employers and by ratifying Defendants SNOOP DOGG and CAMPBELL's
12 misconduct, Defendants SNOOP DOGG, CAMPBELL, SNOOP DOGG'S LLC, THE
13 BROADUS COLLECTION, LLC, CASA VERDE CAPITAL, LLC, MERRY JANE
14 EVENTS, INC., and GERBER are liable to Plaintiff for assault.
15
16

17 112. As a result of the above-described conduct, Plaintiff has suffered and
18 continues to suffer great pain of mind and body, shock, emotional distress, physical
19 manifestations of emotional distress including embarrassment, loss of self-esteem,
20 disgrace, humiliations, and loss of enjoyment of life; has suffered and continues to
21 suffer and was prevented and will continue to be prevented from performing daily
22 activities and obtaining the full enjoyment of life; will sustain loss of earnings and
23 earning capacity, and/or has incurred and will continue to incur expenses for medical
24 and psychological treatment, therapy, and counseling.
25
26
27
28

1 113. Defendants SNOOP DOGG and CAMPBELL's sexual assault is a
2 substantial factor in bringing about these harms to Plaintiff.
3

4 114. The conduct of Defendants was oppressive, malicious and despicable in
5 that it was intentional and done in conscious disregard for the rights and safety of
6 others, and were carried out with a conscious disregard of her right to be free from
7 such tortious behavior, such as to constitute oppression, fraud or malice pursuant to
8 California Civil Code section 3294, entitling Plaintiff to punitive damages against
9 Defendants in an amount appropriate to punish and set an example of Defendants.
10
11

12
13 **PRAYER FOR RELIEF**

14 WHEREFORE, PLAINTIFF prays for judgment as follows:
15

16 As to All Causes of Action

- 17 1. For general, compensatory, and/or special damages in an amount according
18 to proof for Plaintiff's injuries, mental and/or emotional distress, medical
19 expenses, actual financial losses, consequential financial losses, incidental
20 financial losses, loss of past and future earnings, loss of salary and benefits,
21 and all damages flowing therefrom for an amount to be determined at trial;
22
23 2. For all general and special damages to compensate Plaintiff for an amount to
24 be determined at trial;
25
26 3. For punitive damages, as allowed by law, that will sufficiently punish, make
27 an example of, and deter future conduct by Defendants for an amount to be
28

1 determined at trial;

- 2 4. For prejudgment and post-judgment interest according to any applicable
3 provision of law, according to proof for an amount to be determined at trial;
4
5 5. For attorney's fees and costs for an amount to be determined at trial;
6
7 6. Costs of suit; and
8
9 7. For such other and further relief as the Court may deem just and proper.
10
11
12

13 Dated: February 9, 2022

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

17 By: /s/ Matt E.O. Finkelberg
18 MATT E.O. FINKELBERG, ESQ.
19 633 West 5th St., Suite 3250
20 Los Angeles, CA 90071
21 (310) 602-6050
22
23
24
25
26
27
28

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: February 9, 2022

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

By: /s/ Matt E.O. Finkelberg
MATT E.O. FINKELBERG, ESQ.
633 West 5th St., Suite 3250
Los Angeles, CA 90071
(310) 602-6050