

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RECEIVED  
SDNY PRO SE OFFICE  
MAY -1 PM 2:53

ALFREDO P. GONZALEZ,	)	
Plaintiff,	)	NO.
	)	
	)	COMPLAINT FOR DEFAMATION.
V.	)	
	)	
	)	
Bad Boy Entertainment,	)	JURY TRIAL DEMANDED
CEO, SEAN P DIDDY' COMBS,	)	)
Defendant,	)	

Plaintiff allege against the defendant:

**FIRST CAUSE OF ACTION  
(DEFAMATION)  
JURISDICTION**

1. Plaintiff is, and were at all times herein mentioned, domiciled in and citizens of the state of Colorado. Defendant, Mr. Combs, are and were at all times herein mentioned, domiciled in and citizens of the state of New York. Defendant, CEO, Mr. Combs/Bad Boy Entertainment, was and is now a corporation duly organized and existing under the laws of the state of New York, with its offices and principal place of business in the state of New York. This is a civil action involving, exclusive of interest and costs, a sum in excess of \$666,000. Every issue of law and fact in this action is wholly between citizens of different states.
2. Plaintiff is informed and believe and thereupon allege that Defendant, Mr. Combs is the CEO of Bad Boy Entertainment and is doing business as an Entertainment company.
3. Plaintiff is informed and believe and thereupon allege that Defendant, Bad Boy Entertainment, is a corporation duly organized and existing under the laws of the state of New York.
4. Plaintiff is now, and at all times mentioned in this in this complaint have been, resident of Weld County, Colorado.
5. Plaintiff is informed and believed and thereupon allege that at all times herein mentioned, the defendant Mr. Combs was the CEO of Bad Boy Entertainment and in doing the things herein allege, was acting within the scope of said agency.

**BACK GROUND**

6. On 10/08/2017 Kinglucifer was put under investigation by the Department of Homeland Security DHS/Central intelligence Agency CIA for his family ties to Joaquin Guzman Loera aka El

Chapo Guzman/commutation with Ovidio Guzman Lopez/Alfredo Guzman/his relationship with El Chapos daughter Ally Guzman. On or about 5/5/2021 Plaintiff received a phone call from one of Mr. Comb's business partners stating that Mr. Combs was wanting to set up some business deals with Sinaloa Cartel. Plaintiff is always willing to set up business deals with the rich for drugs. So the plaintiff asked what was needed from him and this is when Mr. Combs business partner stated that Mr. Comb's was looking to make a deal to get some young Girls/Boys for a party in New York. The plaintiff told the unknown business partner that he would like to speak to Mr. Comb's but was told that could not happen. This is when plaintiff told the business partner we do not sex traffic under age kids. This is when the unknown business partner told the plaintiff that he has nothing to worry about that Mr. Combs has everything on lock street slang for no one can fuck with us. The plaintiff told Mr. Combs business partner there is no money in that. The business partner told the plaintiff this is a big mistake for not taken the offer from Mr. Combs. The phone call was ended without plaintiff making a deal. All the plaintiff phone call were recorded because he has been under investigation by the DOJ because of his business dealings with Ovidio Guzman Lopez the DOJ has the plaintiff under FISA 1978. 50 U.S.C.S. § 1801 et seq and Title III of the omnibus crime and safe streets Act, 18 U.S.C.S. § 2510 et seq.,. The plaintiff was contacted by this same business partner asking once again if he could help get some under age Boy and Girls over the U.S. Border and that the plaintiff could come to the party and watch the shows they put on. The plaintiff tells the business partner that he is good and that he wants no part in their sex offender shit and not to contact him that Sinaloa wants no part in their sex offenders shit, and fuck Bitch ass Bad Boy Entertainment/Daddy's House Recordings. This is when Mr. Combs business partner told the plaintiff that he can make his life hell because of how much power he has in the streets. Plaintiff tells Mr. Combs business partner do what you do. To date the plaintiff has been monitored by the U.S. Government under FISA 1978 is a waiting charges for drug trafficking, money laundering, and will be getting all of these phone call from Mr. Combs business partner in discovery. To date the plaintiff has made a deal with the Central Intelligence Agency CIA and awaiting to see if the charges go away in exchange for the stop of fentanyl from being trafficked into the U.S. by Sinaloa Cartel. Due to Mr. Combs defamation of the plaintiff he has lost all his business contacts in the state of New York due to the defamation from Bad Boy Entertainment/Mr. Combs. The plaintiff was told by his business partner that he cannot do business with him tell he helps Bad Boy out. This has costed the plaintiff a lot of money.

**Plaintiff allege against defendant Mr. Combs:**

7. On or about 5/5/2021, in the city of New York, state of New York, defendant, Mr. Combs, made the following request to the plaintiff: Defendant requested through his business partner to try to make a business deal with the plaintiff/Sinaloa Cartel to have under age Boys and Girls trafficked to New York City for a party at Daddy's House Entertainment/Bad Boy Entertainment studios.
8. The plaintiff never made the deal, does not make deals with the sex offenders this was told to the defendant and his business partners this is when the business partner told the plaintiff they have power to do whatever they want and they can make shit hard for the plaintiff.
9. On or about 5/12/2021 the plaintiff was talking to a business partner that conducts business in the state of New York and was told that he could no longer do business with the plaintiff due to

not making the business deal with Mr. Combs.

10. Defendants defamation, malicious, oppressive, and in conscious disregard of the plaintiffs reputation. Plaintiff request punitive damages in the amount \$666,000.

WHEREFORE, Plaintiff pray for judgment against defendant as follows:

1. For judgment in the sum of \$666,000.
2. For cost of suit.
3. For such other relief as the court deems just.

Dated: April 14, 2024.



By ALFREDO P. GONZALEZ #142066  
PO BOX 600  
Canon City, CO.81215

VERIFICATION

I, ALFREDO P. GONZALEZ, am the plaintiff in the above entitled action. I have read the foregoing complaint. The facts stated therein are within my knowledge and are true and correct, except those matters stated on information and belief, and, as to those, I believe them to be true and correct.

Colorado Department Of Corrections

Name Alfredo P. Gonzalez

Register Number 147066

Unit D-1-13

Box Number 600

City, State, Zip Canon City, CO

281215

DENVER CO 802

24 APR 2024 PM 8 L

neopost<sup>®</sup>

04/24/2024

US POSTAGE



ZIP 81212  
041L11241745

\$00.92

RECEIVED  
APR 29 2024

U.S. Courthouse  
500 Pearl Street  
New York, NY, 10007

SDNY  
SDNY

RECEIVED  
SDNY PRO SE CONTROL  
2024 MAY -1 PM 2:35

Legal mail

1000751316 0099  
10007-131699

