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IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF LOS ANGELES
CIVIL UNLIMITED

LINDA LUNA AND AYAH ALTAYRI
Plaintiffs,

vs.

TOP DAWG ENTERTAINMENT, LLC;
BRANDON TIFFITH; ANTHONY TIFFITH JR.;
DAVID HARRELL; and DOES 1 to 10,
inclusive,

Defendants.

Case No.: 24SMCV05929

**VERIFIED FIRST AMENDED
COMPLAINT FOR DAMAGES**

1. Sexual Harassment [Civ. Code § 51.9]
2. Battery
3. Assault
4. Negligence
5. Breach of Contract
6. Doxxing [Civ. Code. § 1708.89]

[REQUEST FOR JURY TRIAL]

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PARTIES

1. Plaintiff Linda Luna is a California resident who performed services for TDE from 2019 through the beginning of 2024.

2. Plaintiff Ayah Altayri is an Arizona resident who resided in a home provided by TDE between 2020 and 2021.

3. Defendant Top Dawg Entertainment, LLC (“TDE”) is a California corporation with a principal place of business located at 9595 Wilshire Boulevard, Suite 201, Beverly Hills, California 90212.

4. Defendant Brandon Tiffith is the Chief Marketing Officer of TDE and resides in Los Angeles County.

5. Defendant Anthony Tiffith Jr. is the President of TDE and resides in Los Angeles County. Mr. Tiffith Jr. is also known under the pseudonym “Moosa.”

6. Defendant David Harrell was, on information and believe, at all relevant times herein, acting as an employee of TDE and resides in Los Angeles County. Mr. Harrell is also known under the pseudonym “H-Wood” and “Hollywood.”

JURISDICTION AND VENUE

7. This Court has jurisdiction in this matter because Defendants reside in the State of California and the conduct underlying Plaintiffs’ claims arose in California.

8. Venue is proper in Los Angeles County Defendants’ unlawful actions and omissions, set forth herein, occurred in Los Angeles County.

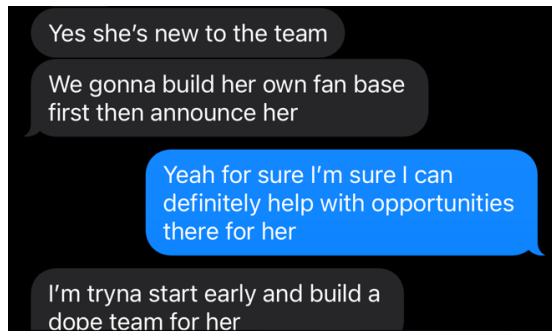
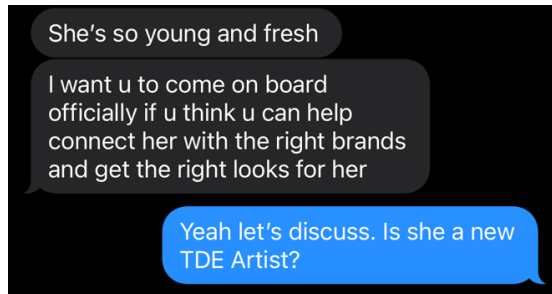
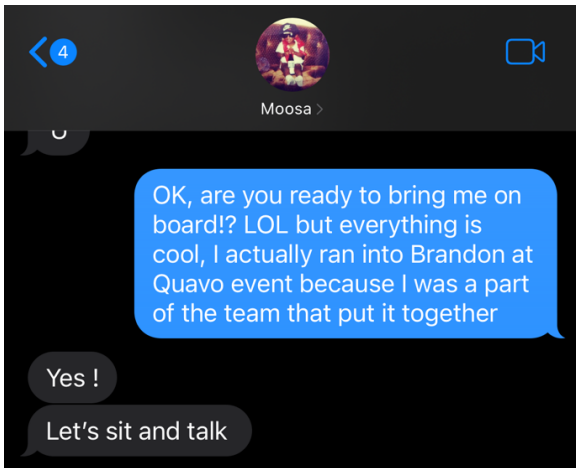
FACTUAL ALLEGATIONS

Professional Services and Unpaid Compensation Owed to Linda Luna

9. In 2017, Defendant Tiffith Jr. initiated discussions over text message with Plaintiff Luna about joining TDE to handle public relations and brand marketing.

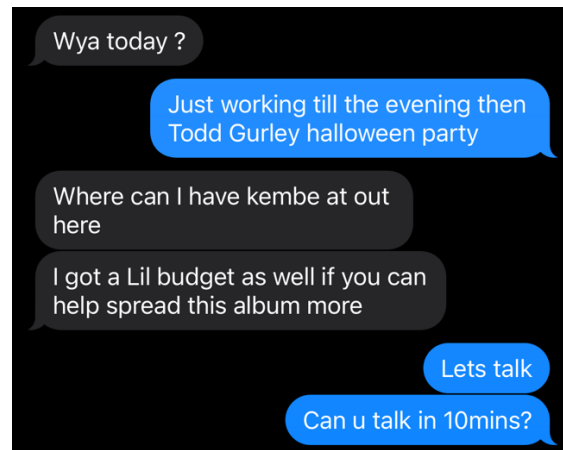
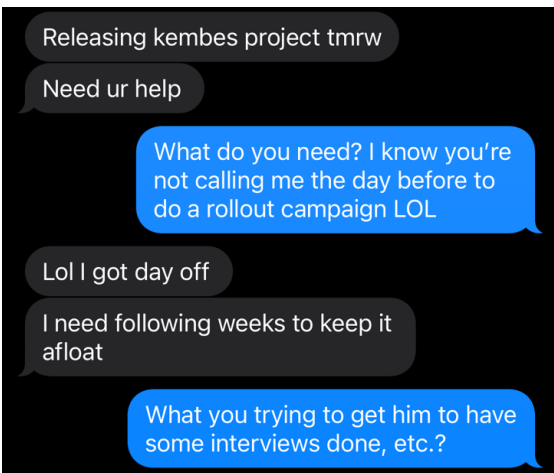
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10. In 2019, Mr. Tiffith Jr. engaged Ms. Luna's services to work with Artist A, agreeing to compensate Ms. Luna at a monthly rate.

11. Mr. Tiffith Jr. also asked Ms. Luna to perform work for other artists affiliated with TDE. For example, in October 2019, he asked Ms. Luna to assist with media and public relations work for one of his artists, Kembe. He continued to request her professional services for Kembe over the course of the week.

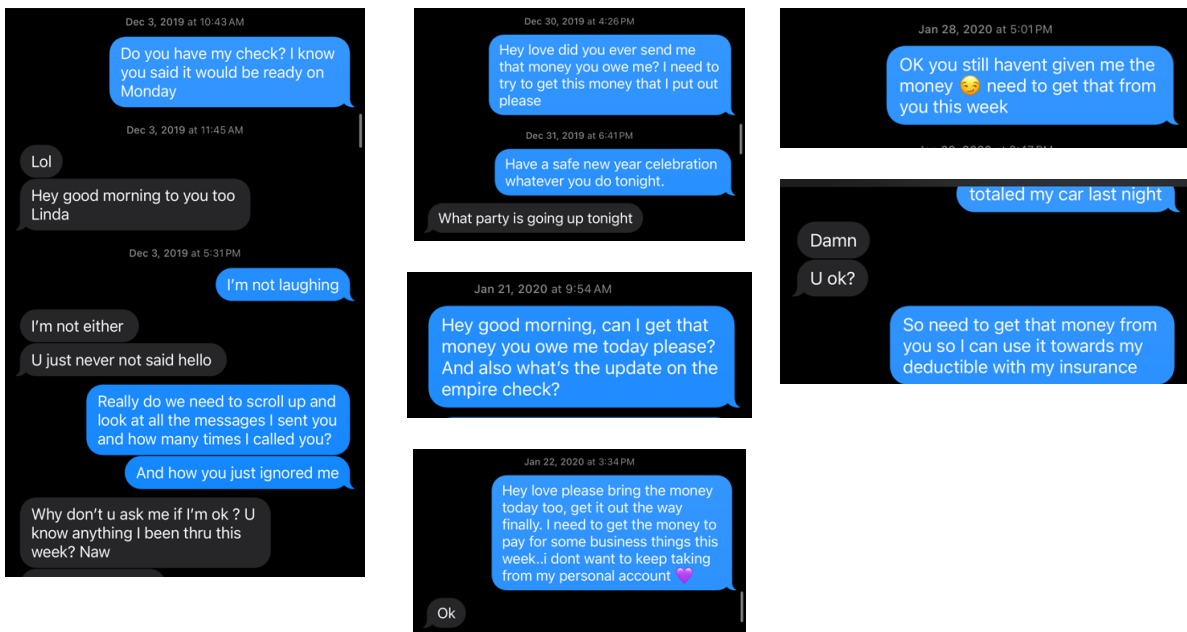


12. Ms. Luna agreed, and performed significant media relations work on Kembe's project. At Mr. Tiffith Jr.'s request, Ms. Luna began to perform services for multiple. TDE-

1 affiliated artists.

2 13. Ms. Luna submitted her invoices to Mr. Tiffith Jr. On November 27, 2019, Mr.
3 Tiffith Jr. confirmed receipt of the invoice in writing. He reimbursed the travel and meal expenses
4 but did not pay the invoice for her professional services.

5 14. Ms. Luna requested payment repeatedly by phone and text message. Each time,
6 Mr. Tiffith Jr. brushed off her requests. At one point, he demanded she exchange pleasantries
7 with him before requesting payment. By the end of January 2020, Mr. Tiffith Jr. had still not paid
8 Ms. Luna's invoice.



15. Over the course of 2019, TDE relied more heavily on Ms. Luna. Ms. Luna began to work with the artist Reason, and also performed services for the TDE Christmas concert in December, including securing host talent and additional site assistance. Mr. Tiffith Jr. expressed interest in having Ms. Luna work with all of TDE's artists, stating that he was going to have to use Ms. Luna for every shoot. He also emphasized his reliance on her professional services, stating—in response to a message from Ms. Luna about her taking lead on project management—
"Take care of me Lin Lin."

//

1 I have one of my other brand
 2 relationships that is going to come
 3 out and make these type of
 4 desserts

4 Do your shit Linda

5 Gona have to use u for every shot

6 Shoot

7 okay luv

8 Make it a dope experience out
 9 there

10 What color balloons?

11 im doing my best

12 Blue

13 Calling all my relationships last
 14 minute... I wish you would've told
 15 me this days ago, i would've had
 this set up fucking amazing LOL

16 Okay got it

I have, I'm gonna have to put a
 calendar together with all the
 different artist and opportunities,
 we just need like a really good
 calendar and worksheet

I'll put it together because we
 know you're not going to do it and
 I cant keep everything in my head
 like you can...I need visual written
 order

Take care of me Lin Lin

16. Yet Ms. Luna observed a pattern in Mr. Tiffith Jr.'s unwillingness to pay for services that extended beyond her own. For example, in Jaunary 2020, a number of dancers were hired to participate in a music video. Mr. Tiffith Jr. agreed to pay them for their participation. After a week, one of the dancers contacted Ms. Luna because she had not yet been paid. When Ms. Luna asked Mr. Tiffith Jr. to pay the dancer, he called her and said "fuck them hoes" and expressed that the dancers should have been happy to simply perform in a TDE video. After insistence by Ms. Luna, Mr. Tiffith Jr. paid the dancer.

17. By early 2020, TDE had incurred additional outstanding payments for the services Ms. Luna was performing for Artist A. In addition to not being fully compensated for her services, Ms. Luna was also paying for expenses out of pocket without full reimbursement. Moreover, at Mr. Tiffith Jr.'s request, Ms. Luna had agreed to allow Artist A to live in her house, with the understanding that TDE—through Mr. Tiffith Jr.—would reimburse Ms. Luna for rent and expenses. Mr. Tiffith Jr. ignored her pleas for payment.

1 Feb 7, 2020 at 3:41 PM
2 Bro, we need to sit down and talk
3 because this is my 5th time
4 buying groceries this past month
5 and my bills just came in and of
6 course the light bill is higher but
7 I'm not like mad but I need you to
8 be mindful and considerate of
9 what I'm picking up over here for
10 you, ARTIST A can eat a whole
11 bag of chips and a whole bottle of
12 snacks in the same day so I have
13 to go back and buy groceries like
14 every few days, this is not cool
15 that you keep saying you gonna
16 give me money but every time
17 something happens where I don't
18 hear from you and we don't
19 connect because you always end
20 up doing something else... You
21 should be more considerate by
22 stopping by and giving me the
23 money or Cash App or something
24 to me, it's not cool that I have to
25 feel like I'm chasing money and
26 you make me feel liable to collect
27 it, you should be doing that

Feb 21, 2020 at 8:33 PM
Hey Moosa I need to get this
money that you owe me from the
work I did and also for ARTIST A
I've got a lot of my plate and I put
out a lot of money for my son
since all the stuff is happened so I
really put this money back in
place...im taking care of my son
and ARTIST A now out of my own
pocket, so I need u to keep your
word and do your due diligence
please..

Mar 8, 2020 at 11:46 PM
Hey Moosa I have not heard back
from you and this is really been a
cat and mouse game.. I feel like
I've been chasing you and it's
really becoming resenting at this
point. I gave ARTIST A money
today so she can get gas and
personal items but I can't keep
taking care of somebody else..
this is the reason why my son had
to move and at this point I am still
helping my son out too. This is not
fair to me to put in the position
where You're taking advantage of
me at this point...you haven't paid
me for my work nor for her staying
here and it shouldn't be that hard
for you to send me money. You
have a responsibility and you need
to own it and quit running from it
and making me chase it... We are

18. By mid- March, Ms. Luna was owed thousands of dollars. Her requests for payment from Mr. Tiffith Jr. continued to be ignored, except for the occasional partial payment of a few hundred dollars. Yet because of the professional relationship between TDE, Mr. Tiffith Jr., and Ms. Luna, Ms. Luna feared that if she took more drastic measures—for example, stopping services until she was paid—she would lose out on the professional opportunity.

19. Through 2020, Ms. Luna continued to perform media relations services for multiple TDE artists, at Mr. Tiffith, Jr.'s request. Indeed, TDE employees referred outside media inquiries to Ms. Luna, stating that Ms. Luna handled PR for the company. For example, in a group

1 text message with Dash Radio in April 2020, a TDE employee referred the Dash representative
2 to Ms. Luna, stating: “Baker, this is Linda she handles our PR.”

3 4/28/20, 2:34 PM

4 Matt Miller - TDE

5 Linda, I have Baker here from Dash Radio,
6 he wanted to do a live thing w Zay, but
7 since we are more focusing on Reason at
8 the moment I told him to get with you about
9 possibly doing it w Reason



7 Baker, this is Linda she handles our PR

8 Joshua - Dash

9 Thanks Matt. Hey Linda- Nice to e-meet
10 you. I do this IG live series with Dash Radio.
11 Would love to do one with Reason. I'm
12 talking to Brad from RCA about doing a
13 separate one with SiR.

14 20. Indeed, Ms. Luna was the point of contact with Rolling Stone magazine relating
15 to a request to feature a short write-up of songs being released for TDE Appreciate Week in 2020.

16 **From:** Linda [REDACTED]
17 **Sent:** Tuesday, April 21, 2020 8:50:46 PM
18 **To:** [REDACTED]
19 **Cc:** Moosa T. [REDACTED]
20 **Subject:** Re: TDE // Rolling Stone

21 Hi [REDACTED]

22 This could be a possibility but the feature would not be able to be posted till after the release of all the songs during the TDE Appreciation Week. But we can
23 set up phone calls with some of the TDE artists this week.

24 In the meantime, can we get Rolling Stone to feature a short write up of the songs thar are dropping each day?

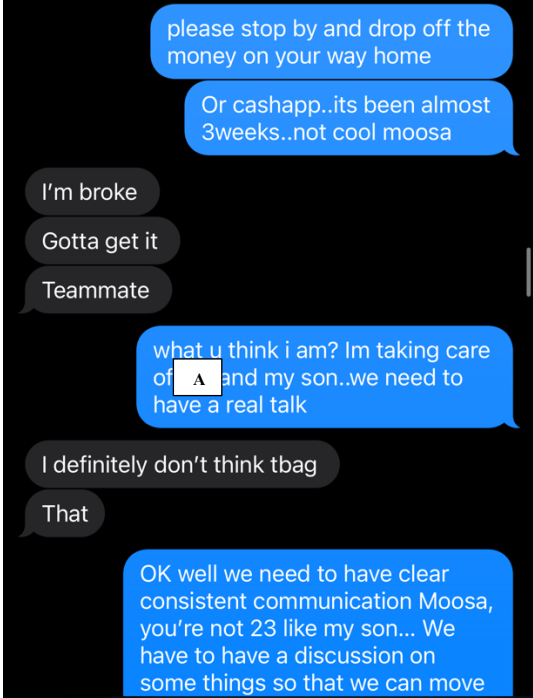
25 Feel free to call me to discuss. Thanks!

26 Linda Luna

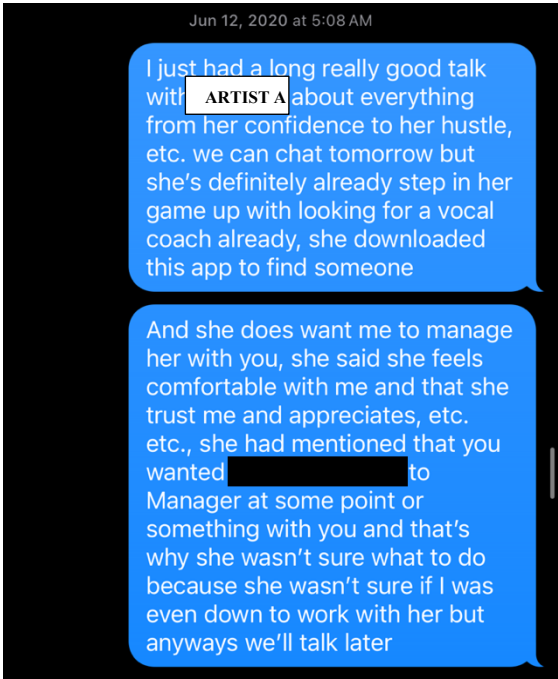
27 21. Through it all, Mr. Tiffith Jr. continued to make late or partial payments for
28 amounts Ms. Luna was owed—despite her repeated requests, in writing, for prompt payment.

29 22. At one point in 2020, Mr. Tiffith Jr. confessed to Ms. Luna that he had no money
30 to pay her, implying that she should work without full and prompt payment because they were
31 “teammates.”

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23. In mid-2020, Mr. Tiffith Jr. told Ms. Luna that because financial constraints prevented him from properly compensating Ms. Luna as agreed, he would offer her a co-management position for Artist A in exchange for a 10 percent management fee. On June 12, 2020, Ms. Luna discussed the co-management with Artist A, who agreed. Ms. Luna texted Mr. Tiffith Jr. to inform him that Artist A was on board.



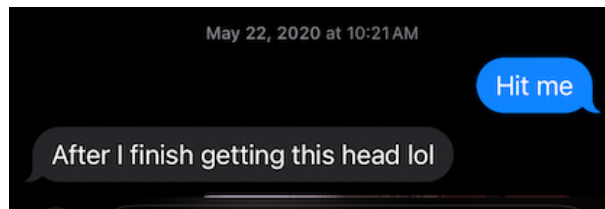
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2 24. Artist A also acknowledged to Ms. Luna that she knew Mr. Tiffith Jr. had failed
3 to pay her for her professional services.

4 I know Moosa doesn't pay you and all that I don't mind getting a side job and
5 helping out I just don't wanna waste this money cause I don't have any
6 income rn

6 **Brandon Tiffith's Sexual Misconduct Towards Linda Luna**

7 25. During the course of Ms. Luna's work for TDE, Brandon Tiffith—Chief
8 Marketing Officer and brother to Mr. Tiffith Jr.—engaged in inappropriate conduct of a sexual
9 nature towards Ms. Luna.

10 26. On May 22, 2020, Ms. Luna texted Mr. Tiffith to ask him to contact her. He
11 responded: "After I finish getting this head lol." Ms. Luna understood Mr. Tiffith to be stating
12 that he was receiving, or was about to receive, oral sex.



16 27. On June 18, 2020, Mr. Tiffith texted Ms. Luna a photograph of a man grabbing a
17 woman by her ponytail from behind while she was bent over and in a state of partial undress,
18 with the angle of the photograph suggesting the man was engaging in sexual intercourse with the
19 woman.

20 28. On January 7, 2021, Mr. Tiffith texted Ms. Luna a cartoon of a woman with
21 exaggerated buttocks, with the caption reading: "Big booty Latina [two tears of joy emojis]."

22 29. On January 8, 2021, Ms. Luna went to lunch with Mr. Tiffith at the Cheesecake
23 Factory. She parked her vehicle at his residence and they carpooled together in Mr. Tiffith's
24 vehicle. At lunch, Mr. Tiffith and Ms. Luna discussed her services for TDE, including for Artist
25 A. Mr. Tiffith ordered alcohol and suggested to Ms. Luna that she drink alcohol as well. Ms.
26 Luna felt pressured to comply and so drank with Mr. Tiffith.

27 30. When they returned to Mr. Tiffith's residence, Mr. Tiffith asked Ms. Luna to
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1 remain in the vehicle with him as he smoked marijuana. Ms. Luna does not smoke marijuana,
2 and did not partake. However, after prolonged exposure to second-hand marijuana smoke, Ms.
3 Luna felt dizzy and asked to lie down before she was ready to drive home. Mr. Tiffith assisted
4 Ms. Luna to a room to rest—where she laid down on the bed. Mr. Tiffith then left. However, he
5 later returned.

6 31. Before Mr. Tiffith re-entered the room, Ms. Luna heard his cousin Ron, who was
7 also in the residence at the time, remark: “This is not gonna end well, B.”

8 32. Mr. Tiffith then entered the room and laid down next to Ms. Luna. He attempted
9 to remove her clothing, partially pulling down her pants and undergarments, and attempting to
10 forcibly kiss her. Ms. Luna objected, stating: “Brandon, what are you doing?” Mr. Tiffith
11 replied: “Come on Linda, you know this was bound to happen.”

12 33. Under the influence of alcohol and second-hand marijuana, Ms. Luna was slow to
13 react as Mr. Tiffith removed his penis from his pants. As she realized what was happening, she
14 attempted to pushed him away.

15 34. As Ms. Luna struggled to get up, Mr. Tiffith grabbed her by the head and forced
16 her mouth towards his penis. As his penis contacted her, she feigned sickness, as if she were
17 about to vomit due to the alcohol. At this, Mr. Tiffith released her, and Ms. Luna escaped into
18 the restroom. In the restroom, Ms. Luna collected herself and then immediately left the residence
19 to drive home. As she left, Mr. Tiffith shouted to her to tell him how traffic was.

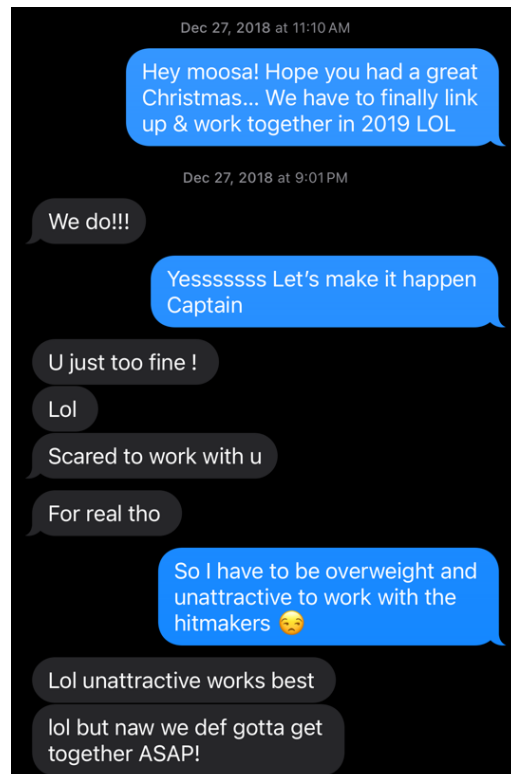
20 35. Ms. Luna wanted to forget it had ever happened. Later that night, once she was
21 safely at home, she sent Mr. Tiffith a text message about traffic, pretending the incident had not
22 happened and everything was normal. The next day, however, she confronted Mr. Tiffith, telling
23 him that that, had she not been under the influence of alcohol, he would not have been able to
24 take advantage of her or gone as far as he had. Mr. Tiffith reacted indignantly, stating she was
25 trying to make him sound like a rapist. She responded, emphasizing what he had done had not
26 been consensual. She pointed out that Mr. Tiffith knew Ms. Luna had been in a relationship with
27 another individual since December 2019, and that Mr. Tiffith could not reasonably believe she
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1 would have consented to his sexual overtures.

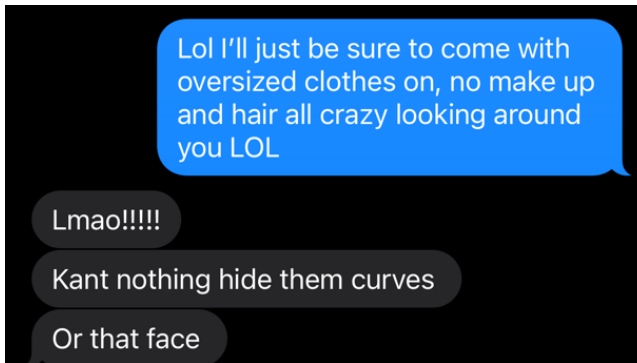
2 **Anthony Tiffith Jr.’s Sexual Misconduct Towards Linda Luna**

3 36. During the course of Ms. Luna’s work for TDE, Anthony Tiffith Jr. (“Moosa”)
4 engaged in inappropriate conduct of a sexual nature towards Ms. Luna.

5 37. From the beginning, Mr. Tiffith Jr. expressed that he felt his attraction to Ms.
6 Luna might affect his ability to work professionally with her, stating in a text message that Ms.
7 Luna was “just too fine” for them to work together and that he was “[s]cared to work with [Ms.
8 Luna],” wishing that she was more unattractive.



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22 38. Although Ms. Luna attempted to jokingly brush off his comments, suggesting she
23 could make herself look unattractive in furtherance of the professional relationship, Mr. Tiffith,
24 Jr. persisted, stating: “Kant nothing hide them curves [o]r that face[.]” While Mr. Tiffith Jr. often
25 framed the unwanted sexual messages as jokes, he also remarked to Ms. Luna that there was
26 truth to jokes.
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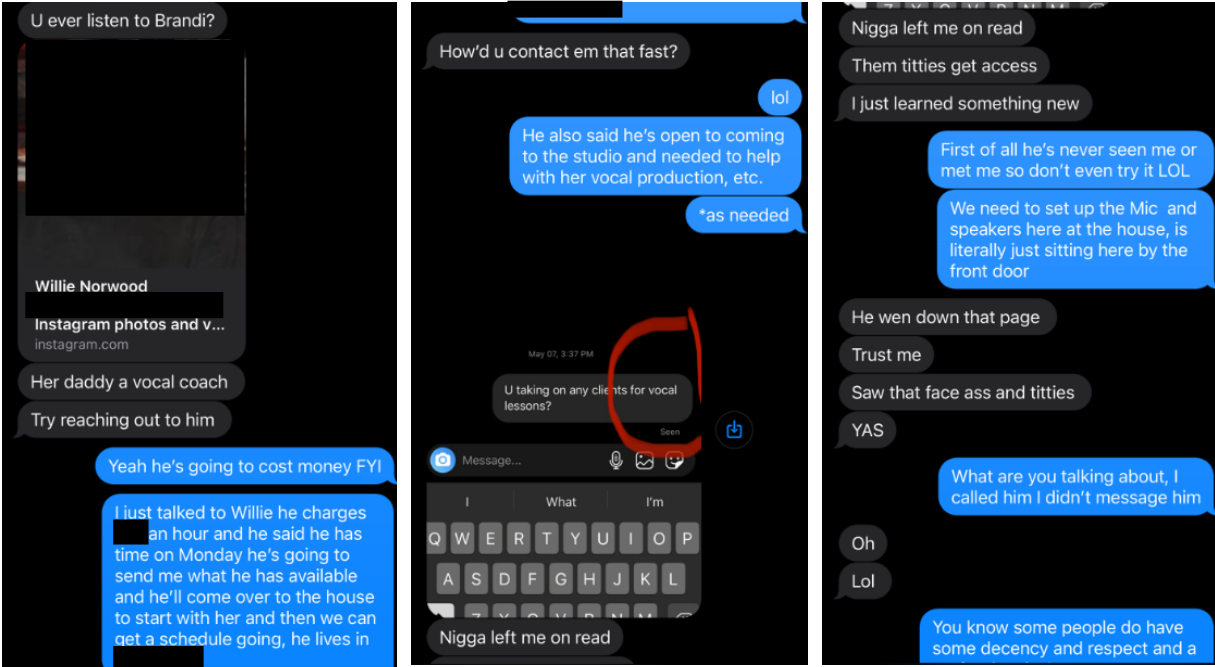
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7 39. On October 30, 2019, Mr. Tiffith Jr. came over to Ms. Luna’s house. They shared
8 a mutual, consensual kiss. Then, Mr. Tiffith Jr. said: “Linda I would put a baby in you right
9 now.” Ms. Luna laughed and told him he was crazy. (Ms. Luna was a single mother who split her
10 time between her profession and caring for her son and elderly mother, and her son was upstairs
11 at the time.) No romantic relationship progressed beyond that night, and Ms. Luna and Mr.
12 Tiffith Jr. maintained their professional relationship.

13 40. In December 2019, Ms. Luna entered a relationship with another individual. She
14 told Mr. Tiffith Jr. because he knew the individual professionally. Mr. Tiffith Jr. acknowledged
15 the relationship.

16 41. Mr. Tiffith Jr. continued to send Ms. Luna inappropriate messages. In May 2020,
17 Ms. Luna called Willie Norwood, a well-respected vocal coach in the industry, to inquire about
18 vocal lessons for Artist A. How Ms. Luna was able to get a response from a vocal coach for
19 Artist A so quickly, Mr. Tiffith Jr. suggested Mr. Norwood had responded to her for sexual
20 reasons, stating it was because he had seen Ms. Luna’s “face ass and titties.”

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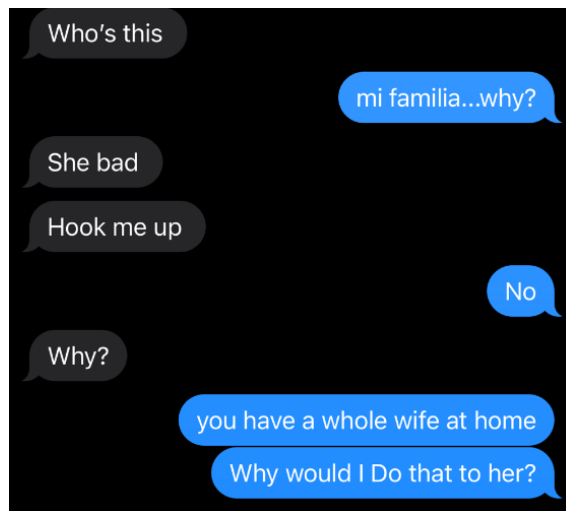
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42. On Mother’s Day in 2020, Mr. Tiffith Jr. wished Ms. Luna a happy Mother’s Day and called her a “milf”—a slang abbreviation for “Mom I’d Like to Fuck.”

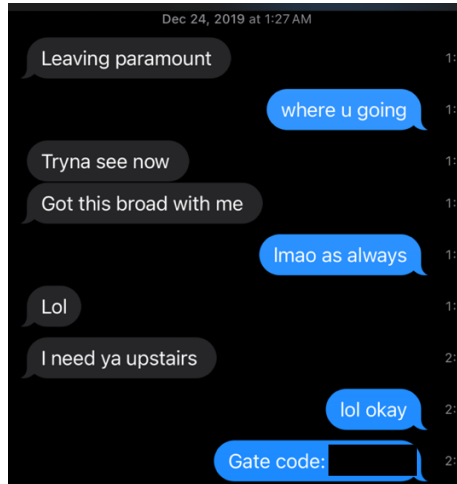
43. On one occasion, Mr. Tiffith Jr. sent Ms. Luna a video of two individuals engaging in intimate activities. This was unconsented and unwanted.

44. On another occasion, Mr. Tiffith Jr. sent Ms. Luna a picture of her and her close friend, and expressed sexual interest in Ms. Luna’s friend. When he asked Ms. Luna to introduce them, she reminded him that he was married.

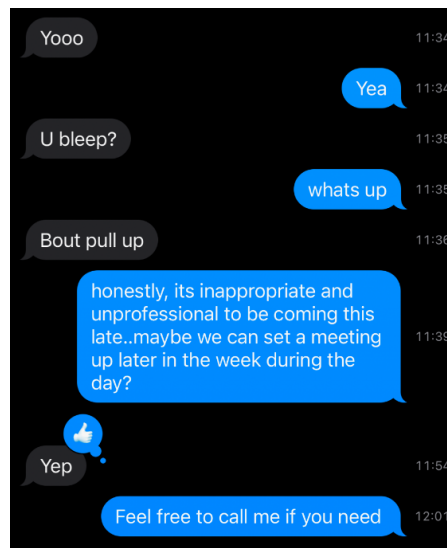


45. On another occasion, Mr. Tiffith, Jr. demanded he be able to use Ms. Luna’s

1 home as a covert location at which to engage in sexual relations with a woman who was not his
2 partner. Mr. Tiffith Jr. didn't ask—he simply told Ms. Luna he needed to use her home for sex.
3 Ms. Luna put on an eager demeanor to accommodate his demand. Mr. Tiffith Jr. was a
4 significant source of work and, as-yet unpaid, income, and Ms Luna was afraid that if she
5 expressed dissatisfaction or said no she would lose the opportunity and the money she was
6 owed—which she needed to support her son and elderly mother.



15 46. Ms. Luna made it clear that she wanted to keep the relationship professional,
16 rebuking Mr. Tiffith Jr. as inappropriate and unprofessional when he attempted to come over to
17 her house at night, unannounced.



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Sexual Assault and Harassment of Ayah Altayri

47. In late 2020, Plaintiff Altayri, a friend of Artist A, moved to California to provide her moral support in her career.

48. TDE provided Ms. Altayri with room and board in a TDE house. On information and believe, other individuals affiliated with TDE also resided in the house.

49. Near the end of 2020, an individual affiliated with TDE, who Ms. Altayri knew as "B-Dawg," approached Ms. Altayri from behind in the kitchen and, without her consent, rubbed his erect genitalia against her buttocks. He repeated this conduct on one other occasion. On information and belief, TDE was aware of the incidence but took no action.

50. On a night in January 2021, Defendant David Harrell, whom Ms. Altayri understood to be affiliated with TDE, was asked to drive Ms. Altayri to a studio he had booked for Artist A—where Artist A and Ms. Luna were waiting. On the way, Mr. Harrell stated that he needed to make a quick pit stop at his apartment to pick something up for Mr. Tiffith Jr.

51. Ms. Altayri trusted Mr. Harrell because she understood he had worked at TDE for over twenty years, and because she knew he was close with Mr. Tiffith Jr., the president of the company.

52. Ms. Altayri followed Mr. Harrell up the steps to his apartment. She tried to stay at the door, assuming Mr. Harrell would run in and pick up whatever he needed to get. From further inside, Mr. Harrell encouraged her multiple times to come in. Finally, she relented, but expressed that she was in a hurry to leave.

53. Mr. Harrell approached her with a shot of alcohol and asked her to drink it before they left. Ms. Altayri declined multiple times. Mr. Harrell persisted, telling her to take the shot and reassuring her, stating: "It's fine, we'll leave right after this." On information and belief, Mr. Harrell knew Ms. Altayri was under the age of twenty-one. Eager to leave the situation, Ms. Altayri drank the shot.

54. Within seconds, Ms. Altayri's stomach started hurting and she began to feel unusual. She sat in a chair and held her stomach.

1 55. Mr. Harrell sat down next to her and pulled her towards him, attempting to move
2 her onto his lap. She was much lighter than Mr. Harrell—only about 100 pounds—and he easily
3 moved her onto his chair. At this point, reached under Ms. Altayri’s hoodie, grabbing her
4 inappropriately. Mr. Altayri yelled: “What are you doing H-Wood?” Mr. Harrell responded:
5 “Relax, it’s fine, just do what I ask.”

6 56. Mr. Altayri yelled at Mr. Harrell to stop multiple times. At this point, Mr. Harrell
7 started removing Ms. Altayri’s pants and touching her intimate areas. He then picked up Ms.
8 Altayri and threw her onto his bed.

9 57. At this point, Ms. Altayri was certain he would be raped if she did not escape.
10 Without thinking twice, she ran out the door and down the street. As she ran, the following
11 thoughts flashed through her mind: she was in a potentially dangerous area; her cell phone was
12 disconnected at the time; and she had no idea where to go.

13 58. She kept running until she found a convenience store. She used a phone to call
14 Artist A, and told her: “H-wood just tried to rape me, call me a Lyft back to Linda’s house now.”

15 59. Ms. Altayri tried to drink water, but she was increasingly dizzy. It did not feel to
16 her like the effects of alcohol alone, and she suspected she had been drugged. She became so
17 dizzy she feared she was going to become unconscious. At that point there is a hole in a memory.
18 The next thing she remembers is waking up in Ms. Luna’s home.

19 60. Ms. Altayri wanted to downplay what had happened because she wanted to protect
20 Artist A’s career. However, Artist A insisted on telling Mr. Tiffith Jr. On information and belief,
21 Artist A subsequently informed Defendant Brandon Tiffith. Ms. Altayri expected that TDE would
22 take steps to ensure Mr. Harrell was not in the same location as Ms. Altayri, but Mr. Harrell
23 continued to perform his work around Ms. Altayri. He pretended like nothing had happened. Ms.
24 Altayri was disgusted by TDE’s response to the incident and decided to cut ties with the company
25 shortly thereafter.

26 **Meeting Between TDE Executives, Ms. Luna, and Artist A**

27 61. On January 28, 2023, Ms. Luna and Artist A met with Mr. Tiffith Jr. and Keaton
28

1 Smith, TDE's general manager.

2 62. The meeting began as a discussion about TDE and Artist A's mutual expectations
3 about their professional relationship. Ms. Luna was in attendance as Artist A's co-manager.

4 63. Artist A recorded the conversation. Mr. Tiffith Jr. encouraged her to record,
5 stating: "If you're going to record, then record...hey press record on your phone, man." Artist A
6 responded: "We've been recording. We're good."

7 64. During the meeting, the conversation turned to Artist A's dissatisfaction with
8 TDE. Both TDE executives began discussing Artist A's character. Mr. Smith stated: "Character
9 is all we have in life. That's the most important thing." Mr. Tiffith Jr. followed up: "Do you
10 dispute that?"

11 65. Following the statements about character, Ms. Luna interjected, raising various
12 instances in the past she believed showed the negative character of TDE's executives, employees,
13 and affiliated individuals.

14 66. Ms. Luna noted TDE's failure to take steps after the incident between B-Dawg and
15 Plaintiff Altayri, stating: "There's been times that people, like, the cousin that you have tried to
16 violate her, you know, her friend, and y'all didn't do anything about it."

17 67. Ms. Luna noted an incident between another individual, Artist I, who she
18 understood was a TDE artist, and Artist A in which Artist I engaged in unwanted sexual overtures
19 towards Artist A, stating: "And there's times that [Artist I] tried to fuck her." When pressed, Artist
20 A interjected to elaborate, stating: "He tried to break into the room. And I wasn't in there. If I was
21 in there he would have come—." Artist A became emotional, and, on the verge of tears, stated
22 that she felt TDE executives did not treat her like a human being.

23 68. Ms. Luna jumped into the conversation again, stating that "[Artist A] doesn't feel
24 protected because of the things that have transpired with her friend where H-Wood tried to almost,
25 almost—" Artist A then interjected: "H-Wood tried to rape Ayah [Altayri] too!" This referred to
26 the incident between Defendant Harrell and Plaintiff Altayri. On information and belief,
27 Defendant Brandon Tiffith was informed about this incident shortly after it occurred, and
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1 Defendants TDE and Tiffith Jr. knew or should have known about the incident.

2 69. Mr. Tiffith Jr. stated that he was completely unaware of the incidents mentioned
3 by Ms. Luna and Artist A. But Ms. Luna pushed back, stating: “Well y’all know about the cousin.”
4 Ms. Luna was referring to the incident between B-Dawg and Plaintiff Altayri. On information
5 and belief, Defendant TDE knew or should have known about the incident.

6 70. At one point, when Ms. Luna attempted to understand the approval process for
7 certain contracts or show promotions, she asked whether she was supposed to run them through
8 Mr. Tiffith Jr. or TDE. Mr. Tiffith Jr. stated: “I am, I own the label.” At the same time, Mr. Smith
9 stated: “He is the label.” Mr. Tiffith Jr. confirmed there was no distinction between him and the
10 label and that there was no other approval process other than direct communication with Mr.
11 Tiffith Jr.

12 71. A few minutes later into the conversation, Mr. Tiffith Jr. accused Ms. Luna of
13 having sex with multiple individuals affiliated with TDE. “And when we’re talking about B-
14 Dawg and Hollywood”—referring to the incidents with Plaintiff Altayri—“you’ve had sex with
15 my brother[.]” At this point, both Ms. Luna and Artist A interjected loudly and both disputed that
16 Ms. Luna had had sex with Defendant Brandon Tiffith.

17 72. Ms. Luna stated, voice raised: “No no no no no no no no no. No! No! I have *never*
18 had sex with Brandon, *ever*.” Mr. Tiffith Jr. responded, “You’ve never done anything sexual with
19 Brandon?” Ms. Luna retorted, voice raised: “No, your brother *violated* me when I was drunk. And
20 your fucking cousin was there. Do *not* go there with me, Moosa! You are fucking crazy that I
21 would fucking sit here and fuck another guy.” (Mr. Tiffith Jr. knew that, at the time of Mr.
22 Tiffith’s assault, Ms. Luna was in a relationship with another individual.) At this point in the
23 conversation, Mr. Tiffith Jr. tried to interrupt, but Ms. Luna continued. “No no no no no! You’re
24 not about to do that to me. You’re throwing fucking allegations...on God, on my son, I’ve never
25 fucked your brother in my life. He *did violate me!* When I was drinking with him!” At this point
26 in the conversation, an argument ensued.

27 73. Ms. Luna expressed her anger at the way TDE had treated her on the basis of her
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1 perceived sexual partners. “You just literally attacked me with saying that I fucked your brother
2 when I never had. No, no, you need to literally shut that shit down. Cause y’all talk about me in
3 the office like I’m a fucking whore and I’m not.” Artist A interjected to confirm TDE’s treatment
4 of Ms. Luna. Ms. Luna continued, “I’m a forty-five-year-old woman who has a college degree
5 who worked hard to be where I’m at. I don’t need my daddy to bring me where I’m at. I don’t
6 need TDE. I’m where I’m at because of me.”

7 74. When Mr. Tiffith, Jr. tried to interrupt, Ms. Luna raised this as an industry-wide
8 issue. “You don’t know what women go through in this industry.” Ms. Luna broke down in tears
9 at this point, and Artist A consoled her. Crying, Ms. Luna continued: “You’re not about to do that
10 to me. I ain’t never fucked Brandon, bro. He violated me. I ain’t never fucked your brother, bro.
11 On God!”

12 75. Later in the conversation, Ms. Luna confronted Mr. Tiffith Jr. about his
13 perpetuation of the false narrative that she had attempted to have sex with Brandon Tiffith.
14 Specifically, Ms. Luna had heard that Mr. Tiffith Jr. was telling other TDE employees that Ms.
15 Luna was attempting to seek out multiple TDE employees to have sex with, including Brandon
16 Tiffith. “You know it’s wrong. If you know that people are lying about someone’s name...because
17 imagine then someone talking about your sister or your own daughter.” Artist A also stated, later
18 in the conversation, that Brandon Tiffith had come into the TDE office, overheard a conversation
19 between two employees about Ms. Luna, and jokingly said to them that Ms. Luna had tried to
20 force herself onto him. On information and belief, Defendants Tiffith, Tiffith Jr., and TDE knew
21 or should have known that managing agents and employees of TDE were discussing Ms. Luna’s
22 perceived sexuality and sexual partners in a disparaging manner.

23 76. Further in the conversation, Mr. Smith stated that he and the company were against
24 violence towards women. At this point, Mr. Luna broke down in tears again, stating: “I’m sorry,
25 but it *has* happened with his brother. Give me a minute, okay? Give me a minute.” At this point
26 Ms. Luna had to stop to compose herself. During that time, on information and belief, Artist A
27 stated that she had previously informed TDE about the incident, and that the incident was also
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1 why Artist A had blocked Brandon Tiffith. Artist A further stated that the reason she did not
2 socialize in the office was because of instances like the ones she and Ms. Luna had raised.

3 77. Artist A further discussed TDE’s knowledge of instances of sexual misconduct.
4 “I’ve told you some of them [...] nothing happens. I told y’all n[----]s B-Dawg tried to do
5 something to Ayah [Altayri]. Nothing happened to that n[----]; fat-ass still walking around the
6 house doing nothing. What is the point if I come and I say something, do you want me to go to
7 the cops?” On information and belief, Artist A informed TDE managing agents after the incident
8 between B-Dawg and Ms. Altayri, but TDE took no action.

9 78. At this point, Artist A recounted the specific facts of the event between Defendant
10 Harrell and Plaintiff Altayri. Again, Artist A challenged TDE’s failure to take action to protect
11 women: “You gotta understand, if I say something one time [...] and nothing happened, what
12 would be the reason for me saying it over and over and over? Clearly [...] I’m not being protected,
13 it’s the [man] being protected.”

14 79. At this point Artist A again recounted additional details of the event between
15 Defendant Harrell and Plaintiff Altayri.

16 80. Mr. Tiffith Jr. argued with Ms. Luna and Artist A about whether or not specific
17 instances had been raised with TDE executives, with Ms. Luna and Artist A pointing out instances
18 where they believed TDE had been notified of misconduct but taken no action. Specifically, Ms.
19 Luna stated that Plaintiff Altayri had informed Defendant Brandon Tiffith about B-Dawg’s
20 misconduct but that no action had been taken.

21 81. Mr. Tiffith Jr. admitted at this point that he had been informed about something
22 relating to B-Dawg and Plaintiff Altayri. But he pointed out that Ms. Altayri had returned back
23 to the TDE house after the incident. Ms. Luna understood this to mean that Mr. Tiffith Jr. had
24 known the details about B-Dawg’s assault on Ms. Altayri, but that he had decided to justify
25 inaction by construing Ms. Altayri’s return to the TDE house as a resolution of any issues.

26 82. Further in the conversation, Artist A raised another incident in which another TDE
27 artist, Artist S, had “busted through [her] door” when she was sleeping, stating that there were
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1 “so many” similar instances of inappropriate behavior directed towards women. She also stated
2 that Artist I had, without consent, sent her a picture of his penis and videos that were sexual in
3 nature. Ms. Luna interjected, recounting that Artist I had offered to pay Artist A’s bills if he could
4 watch Artist A engage in oral sex with another man. Artist A recounted that Artist I had also
5 wanted her to watch him engage in sexual acts with another man.

6 83. Artist A stated that instances like this “are why I don’t feel safe, why I don’t feel
7 like coming into the office. That’s why I act the way I act. It’s not an attitude. It’s protectiveness.”

8 84. The TDE executives—and Mr. Smith in particular—stated, multiple times, that
9 they took such incidents seriously and did not condone such conduct. But Mr. Tiffith Jr. also made
10 statements diminishing the accounts of Ms. Luna and Artist A. Mr. Tiffith Jr. repeatedly cautioned
11 against bringing personal sexual relationships into the workplace, and referred to the discussion
12 about the incidents as “high-schoolish.” Ms. Luna pointed out that this attitude was the very
13 attitude that had motivated her to keep the assault by Brandon Tiffith to herself.

14 85. During the conversation, Mr. Tiffith Jr. clarified that Ms. Luna’s pay for any brand
15 deals that were reached as a result of Ms. Luna’s efforts would be negotiated directly between her
16 and Artist A, and TDE would have no involvement. Ms. Luna understood this arrangement to be
17 separate from the existing 10 percent management agreement between her and TDE.

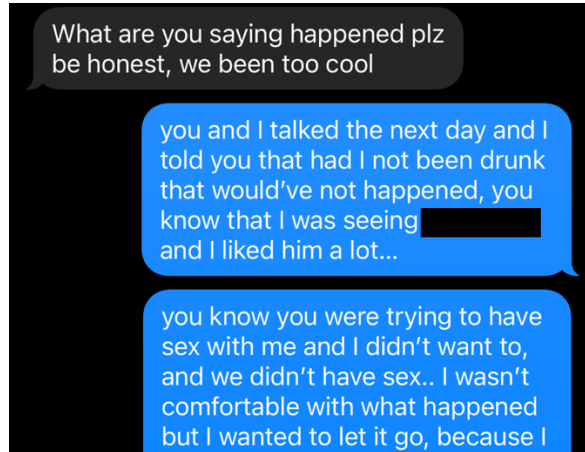
18 86. Nearly three hours into the meeting, Ms. Luna expressed that she needed to know
19 what TDE intended to do now that they knew about Brandon Tiffith’s misconduct, emphasizing
20 again that Mr. Tiffith took advantage of her while she was drunk and that the encounter was
21 nonconsensual. Mr. Tiffith Jr. brushed off the question. Artist A then reminded Mr. Tiffith Jr. that
22 she had previously told him that Brandon Tiffith had forced himself on Ms. Luna. On information
23 and belief, Artist A had previously told Mr. Tiffith Jr. that Brandon Tiffith had assaulted Ms.
24 Luna, but neither Mr. Tiffith Jr. nor TDE took any action.

25 87. Mr. Tiffith Jr. questioned why someone who was taken advantage of would wait
26 a year to come forward. Artist A responded: “That’s how the world works.” Mr. Tiffith Jr.
27 retorted, “That’s not how the world works.” Artist A continued: “I’ve had things happen to me
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1 that I still haven't said anything about. That's how the world works with women. You're not a
2 woman so you won't understand."

3 **Ms. Luna Confronts Brandon Tiffith**

4 88. After the January 28th meeting, Ms. Luna confronted Brandon Tiffith about his
5 comments in the office relating to incident between them. She reminded Mr. Tiffith that he had
6 tried to have sex with her without her consent.



14 **Ms. Luna Meets With Anthony Tiffith, Sr.**

15 89. On February 9, 2023, Ms. Luna met with Anthony Tiffith, Sr. ("Top")— founder
16 of TDE and father of Defendants Anthony Tiffith Jr. and Brandon Tiffith. During the meeting,
17 Ms. Luna discussed her management of Artist A and Ms. Luna and Mr. Tiffith, Sr. agreed that
18 Ms. Luna would be Artist A's sole manager moving forward (as opposed to co-manager with Mr.
19 Tiffith, Jr.).

20 90. During the meeting, Mr. Tiffith Sr. asked Ms. Luna what had happened between
21 her and Defendant Brandon Tiffith. She told Mr. Tiffith Sr. the details of Defendant Tiffith
22 forcibly attempting to have sex with her. Mr. Tiffith brushed it off, commenting that there was no
23 fraternizing in the company but that he did not mind it between consenting adults—suggesting
24 that because alcohol had been involved, the question of consent was murky. But alcohol
25 notwithstanding, Ms. Luna had been unequivocally clear in refusing Mr. Tiffith's advances and
26 Mr. Tiffith had been unequivocally forceful in attempting sex despite Ms. Luna's attempts to stop
27 him. Still, she did not correct Mr. Tiffith because he was at the very top of the TDE hierarchy,
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1 incredibly influential in the industry, and, she believed, exerted a great deal of control over Ms.
2 Luna's professional future.

3 **Artist A Signs a Multimillion Dollar Deal**

4 91. In March 2023, Artist A signed a deal with Warner Records for a multimillion-
5 dollar figure. Artist A told Ms. Luna that, per her agreement with TDE, TDE was responsible for
6 paying the 10 percent management fee to Ms. Luna. TDE never paid Ms. Luna the management
7 fee.

8 **TDE Reveals Plaintiffs' Names in a Public Statement**

9 92. Plaintiffs initially filed this lawsuit under the pseudonyms Jane Doe and Jane Roe,
10 fearing for their reputations and safety if their names were publicly revealed.

11 93. On information and believe, Defendant TDE released a public statement to
12 multiple news outlets on February 1, 2025 through a representative, stating this was a "shakedown
13 lawsuit by Linda Luna and Ayah Altayri," thus revealing Plaintiffs' names to the public.

14 94. Since her identity was revealed, Ms. Luna has received multiple harassing
15 messages from third parties, including the following:

- 16 • "Lying ugly weird ass bitch [tears of joy emoji] I hope you get raped and killed and I hope
17 your family died of cancer to the eyes weak bitch [tears of joy emoji] [...] I hope you ugly
18 dog dies you lying stupid mutt cunt look how ugly you both are I hope you burn alive."
(The message included a photograph of Ms. Luna and her dog from her personal social
19 media account.)
- 20 • "It's hard for women to come forward because of attention seekers such as yourself and
REAL victims have to be weeded out. Shame on you.
- 21 • "You a liar thooooooooo"
- 22 • "You are ugly as hell lmaooooooooo noboxy sexually harassed you. You look like an
OGRE"
- 23 • "Lame ass girl I hope you get locked up for false accusations clown ass B*"

24 95. Ms. Luna has also received multiple harassing messages directed towards her
25 media relations company's social media account, including the following:

- 26 • "What's pussy ass page having comments limited good luck growing coward"
- 27 • "Fuck this agency"

28 96. Following the release of Plaintiffs' personally identifying information, two of Ms.
Luna's clients terminated their professional relationship with her.

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FIRST CAUSE OF ACTION

Sexual Harassment
(Civ. Code § 51.9)

97. Plaintiffs hereby reallege and incorporate by reference all paragraphs above as if set forth in detail herein.

98. This cause of action is brought by Plaintiff Luna against Defendants TDE, Anthony Tiffith, Jr., and Brandon Tiffith; and by Plaintiff Altayri against Defendants TDE and David Harrell.

99. Plaintiff Luna entered a professional relationship with Defendants TDE, Anthony Tiffith, Jr., and Brandon Tiffith, under which Plaintiff would provide professional services for TDE artists.

100. Over the course of this relationship, Defendants Tiffith, Jr. and Tiffith intentionally made unconsented sexual advances towards Plaintiff and engaged in verbal and visual conduct of a sexual nature based on gender.

101. Defendants Tiffith Jr. and Tiffith's conduct was unwelcome and pervasive.

102. On information and belief, Defendant Tiffith Jr. and Tiffith's conduct was ratified by Defendant TDE, which had knowledge of said conduct but took no actions to prevent it.

103. On information and belief, at all relevant times, Defendants Tiffith, Jr. and Tiffith were managing agents of Defendant TDE.

104. Plaintiff Altayri entered a service relationship with Defendant TDE, under which Defendant provided room and board in exchange for Plaintiff providing moral support to Artist A.

105. Over the course of this relationship, Defendant David Harrell and B-Dawg made unconsented sexual advances towards Plaintiff. B-Dawg engaged in physical conduct of a sexual nature.

106. Defendant Harrell and B-Dawg's conduct was unwelcome, pervasive, and severe.

107. On information and belief, Defendant Harrell's and B-Dawg's conduct was ratified by Defendant TDE, which had knowledge of said conduct but took no actions to prevent

1 it.

2 108. On information and belief, at all relevant times, Defendant Harrell and B-Dawg
3 were agents of Defendant TDE.

4 109. As a result of the above-described conduct, Plaintiffs have suffered and continue
5 to suffer from emotional distress. They have also sustained an economic disadvantage.

6 **SECOND CAUSE OF ACTION**

7 Battery
8 (Common Law)

9 110. Plaintiffs hereby reallege and incorporate by reference all paragraphs above as if
10 set forth in detail herein.

11 111. This cause of action is brought by Plaintiff Luna against Defendants TDE and
12 Brandon Tiffith.; and by Plaintiff Altayri against Defendant TDE.

13 112. Defendant Brandon Tiffith touched Plaintiff Luna with the intent to harm or offend
14 her.

15 113. Plaintiff Luna did not consent to the touching.

16 114. Plaintiff Luna was harmed and offended by the touching.

17 115. A reasonable person in Plaintiff Luna's situation would have been offended by the
18 touching.

19 116. On information and belief, Defendant Tiffith was a managing agent of Defendant
20 TDE.

21 117. B-Dawg touched Plaintiff Altayri with the intent to harm or offend her.

22 118. Plaintiff Altayri did not consent to the touching.

23 119. Plaintiff Altayri was harmed and offended by the touching.

24 120. A reasonable person in Plaintiff Roe's situation would have been offended by the
25 touching.

26 121. On information and belief, B-Dawg was an agent of Defendant TDE.

27 122. As a result of the above-described conduct, Plaintiffs have suffered and continue
28 to suffer from emotional distress and have suffered a violation of their rights to be free from

1 sexually unwanted conduct in a manner that constitutes oppression and malice, entitling Plaintiffs
2 to punitive damages.

3 **THIRD CAUSE OF ACTION**

4 Assault
5 (Common Law)

6 123. Plaintiffs hereby reallege and incorporate by reference all paragraphs above as if
7 set forth in detail herein.

8 124. This cause of action is brought by Plaintiff Luna against Defendants TDE and
9 Brandon Tiffith.; and by Plaintiff Altayri against Defendant TDE.

10 125. Defendant Brandon Tiffith used force in an attempt to engage in sexual acts with
11 Plaintiff Doe.

12 126. It reasonably appeared to Plaintiff Luna that Defendant Tiffith was about to carry
13 out the sexual acts.

14 127. Plaintiff Luna did not consent to Defendant Tiffith's conduct.

15 128. On information and belief, at all relevant times, Defendant Tiffith was a managing
16 agent of Defendant TDE.

17 129. On information and belief, Defendant Tiffith's conduct was ratified by Defendant
18 TDE, which had knowledge of said conduct but took no actions to prevent it.

19 130. B-Dawg used force in an attempt to engage in sexual acts with Plaintiff Altayri.

20 131. It reasonably appeared to Plaintiff Altayri that B-Dawg was about to carry out the
21 sexual acts.

22 132. Plaintiff Altayri did not consent B-Dawg's conduct.

23 133. On information and belief, at all relevant times, B-Dawg was an agent of
24 Defendant TDE.

25 134. On information and belief, B-Dawg's conduct was ratified by Defendant TDE,
26 which had knowledge of said conduct but took no actions to prevent it.

27 135. As a result of the above-described conduct, Plaintiffs have suffered and continue
28 to suffer from emotional distress and have suffered a violation of their rights to be free from

1 sexually unwanted conduct in a manner that constitutes oppression and malice, entitling Plaintiffs
2 to punitive damages.

3 **FOURTH CAUSE OF ACTION**

4 Negligence
5 (Common Law)

6 136. Plaintiffs hereby reallege and incorporate by reference all paragraphs above as if
7 set forth in detail herein.

8 137. This cause of action is brought by both Plaintiffs against Defendant TDE.

9 138. Defendant TDE had a duty to protect Plaintiffs from unwanted and harassing
10 conduct by its employees.

11 139. Such duty was based on the special relationship between Plaintiffs and Defendant
12 TDE, and the agency relationship between TDE and its employees.

13 140. On information and belief, TDE knew or should have known that its employees
14 and managing agents were likely to engage in unwanted and harassing conduct of Plaintiffs.

15 141. By failing to protect Plaintiffs from unwanted and harassing conduct by TDE's
16 employees and managing agents, TDE breached its duty.

17 142. As a result of the above-described conduct, Plaintiffs have suffered and continue
18 to suffer from emotional distress, and have suffered a violation of their rights to be free from
19 sexually unwanted conduct in a manner that constitutes oppression and malice, entitling Plaintiffs
20 to punitive damages.

21 **FIFTH CAUSE OF ACTION**

22 Breach of Contract
23 (Common Law)

24 143. Plaintiffs hereby reallege and incorporate by reference all paragraphs above as if
25 set forth in detail herein.

26 144. This cause of action is brought by Plaintiff Luna against Defendant TDE.

27 145. Plaintiff and Defendant TDE, through its President Anthony Tiffith Jr., entered
28 into an agreement with Defendant Anthony Tiffith, Jr., on behalf of TDE, under which Ms. Luna

1 would perform professional services for TDE artists in exchange for compensation.

2 146. Plaintiff performed professional services for TDE artists as required by the
3 agreement.

4 147. TDE failed to compensate Plaintiff under the terms of the agreement.

5 148. Plaintiff was therefore economically harmed, as she was not financially
6 compensated for the time, effort, and resources she spent performing her contractual services.

7 149. Defendant TDE's breach of contract was a substantial factor in causing Plaintiff's
8 harm.

9 **SIXTH CAUSE OF ACTION**

10 Doxxing

(Civ. Code § 1708.89)

11 150. Plaintiffs hereby reallege and incorporate by reference all paragraphs above as if
12 set forth in detail herein.

13 151. This cause of action is brought by both Plaintiffs against Defendant TDE.

14 152. On information and belief, Defendant TDE electronically distributed and
15 published personally identifying information of Plaintiffs—specifically, their names, which were
16 previously unknown to the public in relation to the allegations in the instant action.

17 153. On information and belief, Defendant TDE released Plaintiffs' personally
18 identifying information through an electronic communication device.

19 154. Defendant TDE released Plaintiffs' personally identifying information without
20 their consent.

21 155. On information and belief, Defendant TDE released Plaintiffs' personally
22 identifying information for the purpose of imminently causing Plaintiffs unwanted harassment by
23 third parties. Indeed, Plaintiffs cannot imagine a legitimate, non-harassing purpose behind TDE's
24 release of their personally identifying information.

25 156. The release of Plaintiffs' personally identifying information was likely to incite or
26 produce harassment by third parties.

27 157. As a result of the above-described conduct, Plaintiffs have suffered emotional
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1 distress. Plaintiff Luna has additionally suffered economic harm.
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2 **PRAYER FOR RELIEF**

3 WHEREFORE, Plaintiff, prays for judgment against Defendants as follows:

- 4 A. For actual and compensatory damages according to proof pursuant to all applicable laws
5 and regulations;
- 6 B. For civil and statutory penalties available under applicable law;
- 7 C. For statutory damages pursuant to Civ. Code § 1708.89;
- 8 D. For pre-judgment and post-judgment interest;
- 9 E. For punitive damages;
- 10 F. For an award of attorneys’ fees, costs and expenses as authorized by applicable law;
- 11 G. For such other and further relief as this Court may deem just and proper; and
- 12 H. For trial by jury on all causes of action so triable.

13 Date: February 5, 2024

ARNS DAVIS LAW

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16 By: _____
17 SHOUNAK S. DHARAP
18 Attorneys for Plaintiff
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