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26 SUPERIOR COURT OF THE STATE OF CALIFORNIA

27 COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE

28 JANE ROE,

Plaintiff,

vs.

GARTH BROOKS,

Defendant.

) Case No. **24STCV25693**

) **UNLIMITED JURISDICTION**

) **COMPLAINT FOR DAMAGES:**

-) (1) Assault
-) (2) Battery
-) (3) Sexual Battery (Civ. Code § 1708.5)
-) (4) Bane Act (Civ. Code § 52.1)
-) (5) Ralph Act (Civ. Code § 51.7)
-) (6) Gender Violence (Civ. Code § 52.4(c)(2))

) **DEMAND FOR JURY TRIAL**

1 Plaintiff Jane Roe (“Plaintiff” or “Ms. Roe”) hereby submits her Complaint against
2 Defendant Garth Brooks (“Defendant” or “Brooks”), and alleges as follows:

3 **PRELIMINARY STATEMENT**

4 1. In 1999, Plaintiff was hired to do the make-up and hair styling for the Grammy
5 award winning artist Trisha Yearwood. Ms. Roe continued to work for Ms. Yearwood over the
6 years, as well as for many other celebrities, and in 2017 she started to do make-up and hair styling
7 for Garth Brooks, Ms. Yearwood’s husband.

8 2. By 2019, after Brooks learned that Ms. Roe was experiencing financial difficulties,
9 he hired Ms. Roe more often. She was grateful for the additional income and thanked him
10 repeatedly.

11 3. It did not take long for Brooks to take advantage of her financial hardship. Brooks
12 seized what he saw as an opportunity to subject a female employee to a side of Brooks that he
13 conceals from the public. This side of Brooks believes he is entitled to sexual gratification when
14 he wants it, and using a female employee to get it, is fair game.

15 4. One day in 2019 when Ms. Roe was at Brooks’ house to style his hair and do his
16 make-up, she looked up in horror as Brooks walked out of the shower, naked, with an erection and
17 pointing his penis at Ms. Roe, came directly toward her. He grabbed her hands and forced them
18 onto his erect penis. Brooks appallingly told Ms. Roe that he had fantasized about this moment
19 and wanted her to perform oral sex on him so that he could “come all over her face,” specifically
20 while she had her “glasses on.”

21 5. Shocked and confused, Ms. Roe pulled back and said she was not going to do what
22 he wanted. Knowing that she needed the work, however, Brooks correctly predicted that Ms. Roe
23 did not leave.

24 6. In May 2019, Brooks asked her to travel to Los Angeles with him for a Grammy
25 tribute to Sam Moore. Usually there were others on Brooks’ private jet but this time, Ms. Roe and
26 Brooks were the only two passengers. Once in Los Angeles at the hotel, Ms. Roe could not believe
27 that Brooks had booked a hotel suite with one bedroom and she did not have a separate room.

1 After they arrived, suddenly Brooks appeared in the doorway to the bedroom, completely naked.
2 He stood there and flexed his muscles. Ms. Roe immediately had a sick feeling in her stomach,
3 knowing she was trapped in the room alone with Brooks, with no one to help and far away from
4 Nashville.

5 7. Tragically, her worst fears came true when seconds later he was towering over her,
6 his 6-foot and almost 300-pound frame ready to pounce on Ms. Roe, who is less than 5 feet and
7 100 pounds. As she began to panic, he grabbed her hands and pulled her into the next room and
8 onto the bed where she could not escape his physical domination.

9 8. Brooks' rape of Ms. Roe was painful and traumatic. Having no regard for her well-
10 being and intent on his own sexual gratification at the expense of Ms. Roe's physical, mental and
11 emotional trauma, at some point during the nightmare, Brooks even held her small body upside
12 down by her feet and penetrated her.

13 9. She was helpless to move from his grip and terrified at what was happening to her.
14 While he held her upside down, dangling by her ankles -- all the blood rushed to her head, causing
15 her to be dizzy and sick. While Brooks forcefully penetrated her, he said perverted things to Ms.
16 Roe about his sexual prowess.

17 10. Brooks also repeatedly slammed his penis into her vagina causing Ms. Roe's back
18 to keep hitting his body over and over with such force she felt as if he was breaking her in two.
19 Disgustingly, Brooks insisted that Ms. Roe wear her eyeglasses while he carried out his sexual
20 assault fantasy.

21 11. With cold disregard for Ms. Roe, when Brooks was finished, it was business as
22 usual. Ms. Roe worked quickly to style his hair and do his make-up for the event so he was on
23 time.

24 12. Brooks subjected Ms. Roe to other appalling sexual conduct, all of which took place
25 while Ms. Roe was working for him, that includes but is not limited to the following:
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- Brooks openly talked about sexual subjects in front of Ms. Roe, including for example, cunnilingus;
- Brooks regularly changed his clothing in front of Ms. Roe, and often purposefully exposed his genitals and buttocks to Ms. Roe, knowing that she would respond with a look of horror and disgust;
- Brooks repeated the sexual fantasy he said when he came out of the shower with an erection and forced her hands on his penis to Ms. Roe, and forced her to listen to other sexual fantasies he had about her performing sexual acts on him;
- Brooks sent Ms. Roe sexually explicit text messages and pressured her to engage in sexting with him;
- After the sexual assault in Los Angeles, Brooks increased the frequency of saying his sexual fantasies about her aloud, along with his physical gropings of her breasts while she was doing his hair and make-up;
- Other sexually explicit remarks by Brooks included him telling Ms. Roe that he had **“fucked multiple women in every corner of a hotel room,” “white, black, brown, or whatever,”** and also said that he had done so **“on every surface”** in a hotel room;
- Brooks’ increased frequency of his sexually charged conversations included his repeated remarks about having a threesome with his wife, Ms. Yearwood, in which he suggested that Ms. Roe would be the third person, which Ms. Roe believes Brooks’ wife overheard on at least one occasion;
- On too many occasions to list, Brooks would lasciviously stare at Ms. Roe’s breasts and pressure Ms. Roe to open her shirt to allow him to physically touch her breasts for purposes of his arousal after which Brooks would then masturbate; and regarding this, Brooks, who said he would **“take care of himself,”** also told Ms. Roe he could not let her see because, **“when I come, it’s gallons.”**;
- In late October 2019, Brooks brought Ms. Roe to Los Angeles for five days during which he physically groped her body including her breasts; Ms. Roe was terrified to be in a hotel again worried that he would force himself on her. Her fears were justified as one morning when Ms. Roe went to Brooks’ room to do his hair and make-up, he was on the bed, face down, wearing loose shorts and holding his crotch, and made it clear that he wanted to do what he had done before in Los Angeles with Ms. Roe on May 11. Ms. Roe managed to escape the situation because he was running late and people were waiting to pick him up;

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- At times, Brooks implied the groping of her breasts would continue despite Ms. Roe insisting this was unwanted, for example, one time when he said while groping her, “Next time we mess around,” and Ms. Roe clearly said “no,” he became visibly angry at Ms. Roe and left;
- The frequency was such that it was inevitable that other employees of Brooks’s likely saw or heard instances of the unwanted physical groping of her breasts while she was styling his hair and doing his make-up;
- In or about May 2020, Brooks, while speaking to his manager, and with his wife also present, directly in front of Ms. Roe talked about inventing a shampoo bottle that would double as a dildo. When Ms. Roe became uncomfortable and would not join in the conversation Brooks became upset and slammed his fists down on the kitchen counter in frustration so hard that items on the counter moved and he leaned in and spoke in a threatening manner to Ms. Roe. Following this incident, Ms. Roe sent a text to Brooks:
 - “I have thought a lot about the conversation of last Monday. I can’t work in an environment where explicit sexual comments are made about shampoo bottles doubling as dildos. I mean you no harm, and if you truly value my work, I am happy to show up tomorrow and/or whenever you may need my services.”¹

13. During phone conversations in 2020, after she told Brooks that she was upset he told his wife that Ms. Roe had seen his penis, Brooks tried to minimize what happened and said:

“Oh sweetheart – for one, I think I know Trisha pretty well and she wasn’t uncomfortable. And I said you saw my stuff.....that was it...we were talking about something and it just came up. Look, I’m worried you are over thinking this.”

14. After the sexual assault in Los Angeles, Brooks told Ms. Roe about a mysterious text message he received in which a person claimed that Brooks had “**ruined his life.**” In a phone conversation about this text, Brooks said he had “no idea” who had texted him the message and suggested that he thought it was Ms. Roe’s husband who had sent the text and tried to get her to reveal her husband’s phone number.

¹ Any email, text message or content of telephone conversations placed within quotations herein, are direct quotes from the documents or audio recordings.

1 15. Brooks told Ms. Roe, “I never want to hurt anybody so that one [the mysterious
2 text], it bothered me. ***It bothered me.*** I didn’t know the number....”

3 16. Still referring to the supposed text message, Brooks also said: “And that killed me.
4 It broke my heart, like god, *I never want to hurt anybody.* So I was just – *I was scared to death.*”
5 Brooks then started to talk about the fact that Ms. Roe had not worked for Brooks for several
6 months, so he had one of his employees call her to see what was happening, “And then, you know,
7 when they called you for work and you couldn’t do it for two months, I thought ohhhhhhhh
8 craaaap! That’s what I thought. Oh crap! So, I was trying to seek you out to come talk ... **or**
9 **whatever I needed to do**, but just, uh, **I don’t want to hurt anybody**, man. And just, ... **I just**
10 **felt bad.**”

11 17. Of course Brooks knew that the sexual assault and rape that he had subjected Ms.
12 Roe to in Los Angeles was “bad” and further, she had told him about the severe back and neck
13 pain she was experiencing.

14 18. Concerned about the repercussions if she denied him the ability to sexually force
15 himself on her again, Ms. Roe said on a call to Brooks in 2020, “I want to make sure that - that
16 even though I’ve told you ‘no’, that you’re cool with ‘no’. **I mean ‘no’ as in ‘no fooling around**
17 **like we had done**– you are cool with that? Right?”

18 19. She was fearful that despite what he said that Brooks was angry and upset with her.
19 Ms. Roe said: “when I saw you ... with [another music artist], you were pretty upset with me.”
20 Incredibly, Brooks replied as follows:

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22 “Noooooo! I would never be upset with you....look at it this way, okay?
23 Look at it – the best way I can explain it is. **Me and you broke into a**
24 **jewelry store and the second we broke the door we looked at each other**
25 **and said this isn’t right. But we already had broken the door. And so,**
26 **I think me and you get out and run and just hope that nobody ever finds**
27 **out and just love one another and be friends. ... Is that fair?”**

28 20. Brooks told her in 2020: “I work with the best. And I don’t want to do something
stupid that breaks this team up. So ... I will do whatever I need to do or do whatever I don’t need

1 to do. But I just want to keep working with you.... but if you feel weird working with me, it's
2 fine. We don't have to work together."

3 21. In response, Ms. Roe said, "I've never – found myself in a situation that is.... I just
4 don't know that I'm going to be able to look up from. And I'm frankly, **I am a little frightened**
5 **of you ... I really am.**"

6 22. Brooks said, "Sweet baby! I'm so sorry. I can't imagine! **That makes me**
7 **frightened of you!**"

8 23. In this phone conversation, Ms. Roe explains that it would be "difficult" to work
9 with Brooks again, to which Brooks said, "I am asking you to work together forever," and "you
10 have a place here as long as you want it. I'm lucky to have you I don't want this to go
11 anywhere. And I don't want something that happened in the moment to screw the whole 20 years
12 I've known you."

13 24. In addition to phone calls, there were multiple text exchanges between Brooks and
14 Ms. Roe but while Ms. Roe was at a studio with Brooks to style his hair in 2020, Brooks
15 surreptitiously took her phone and deleted most of the text messages that he had sent to her
16 containing explicit sexual content.

17 25. Eventually Ms. Roe was unable to continue working for Brooks and she sought
18 legal counsel about what had happened. In addition, in or about May 2021, Ms. Roe moved to
19 Mississippi.

20 26. When Ms. Roe's counsel contacted Brooks and disclosed the fact that Ms. Roe was
21 prepared to file a complaint in California to hold him accountable for his sexual assaults, and even
22 shared a copy of the drafted California complaint with Brooks, he used the fact that Ms. Roe had
23 dared to speak about the harm he forced on her as an opportunity to inflict even more harm and
24 pain on Ms. Roe.

25 27. Specifically, while pretending to be in discussions with Ms. Roe to resolve her legal
26 claims against him, on September 13, 2024, Brooks filed a preemptive abusive Complaint against
27 Ms. Roe under the Declaratory Judgment Act, in the United States District Court For The Southern

1 District of Mississippi, Northern Division, entitled *John Doe v. Jane Roe*, Case No. 24 Civ. 00547
2 (HTW) (LGI) (hereinafter the “**Abusive Mississippi Action**”).

3 28. Incredibly, in the Abusive Mississippi Action Brooks labeled himself the “victim”
4 and claimed that Ms. Roe was a lying extortionist who intended on destroying his professional
5 reputation. Brooks alleged that she threatened to file her complaint, in California, only because
6 Brooks refused to give her a raise and pay for health insurance.

7 29. The Abusive Mississippi Action by Brooks is a blatant attempt to further control
8 and bully his sexual assault victim by utilizing his multi-millionaire resources to game the legal
9 system.

10 30. As part of the lawsuit he filed against Ms. Roe in desperation, Brooks
11 simultaneously filed a motion to proceed under the pseudonym “John Doe.” The basis for this, as
12 described by Brooks, was because he has a “well-earned reputation as a decent and caring person,”
13 and therefore, if the sexual assault allegations are disclosed, he says it would create “unavoidable
14 damage to his family.”

15 31. Brooks is desperate to prevent his millions of fans from learning about the horrific
16 things he has said and done to a junior female employee who did nothing to deserve such treatment.

17 32. But our legal system is not in place to allow wealthy wrongdoers the ability to run
18 work-arounds on sexual assault victims who attempt to hold perpetrators accountable. Yet, this is
19 precisely what Brooks is trying to do in the Abusive Mississippi Action.

20 33. As set forth below, Ms. Roe commences this action pursuant to California’s
21 Sexual Abuse and Cover-Up Accountability Act, AB 2777, because her claims are “based on
22 conduct that occurred on or after January 1, 2009, and [are] commenced []after January 1, 2019,”
23 see Cal. Code Civ. Proc. § 340.16(b)(3). Ms. Roe seeks all appropriate relief to redress Brooks’
24 egregious and unlawful actions in violation of common law torts for Assault and Battery, and in
25 violation of California state statutes for Sexual Battery, Ca. Civ. Code § 1708.5; the Bane Act, Ca.
26 Civ. Code § 52.1; the Ralph Act, Ca. Civ. Code § 51.7; and Gender Violence, Ca. Civ. Code §
27 52.4(c)(2).

1 **PARTIES**

2 34. Plaintiff Jane Roe is an adult citizen and resides in the State of Mississippi.

3 35. Defendant Garth Brooks is an adult citizen and resides in the State of Tennessee.

4 36. This Court has jurisdiction over this action pursuant to California Code of Civil
5 Procedure § 410.10. Jane Roe seeks damages under the statutory and common law of the State of
6 California.

7 37. Venue is proper is this Court pursuant to California Code of Civil Procedure § 395
8 because: (a) acts and transactions described herein occurred within this county.

9 **FACTS COMMON TO ALL CAUSES OF ACTION**

10 **I. Background: Garth Brooks**

11 38. At age 62, Garth Brooks is a two-time Grammy winner and has sold more than 162
12 million albums, making him the second best-selling artist of all time in the U.S. - second only to
13 the Beatles in total albums sold.

14 39. His estimated net worth is about \$400 million, and Forbes estimated that he made
15 \$45.5 million in 2018 alone.

16 40. When he is not recording music and selling it, Brooks is involved in numerous
17 foundations and charities, including many dedicated to children. For example, he founded the
18 Garth Brooks' "Teammates for Kids" Foundation² which, in partnership with professional athletes,
19 corporations and other celebrities, helps children by funding and supporting programs in hospitals,
20 sports for inner city children and educational opportunities.

21 41. In addition, Brooks is involved in Habitat for Humanity, the Carter Work Project³,
22 in which he and his wife were named the inaugural Habitat Humanitarians alongside President
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26 ² See <https://www.teammatesforkids.com/tm4kBoard.php>.

27 ³ See <https://www.habitat.org/carter-work-project/habitat-humanitarians-garth-brooks-and-trisha-yearwood>.

1 Jimmy Carter and former First Lady Rosalynn Carter. In connection with this charitable work,
2 Brooks has publicly said that “When I think of home, it is that safe place, one of those things that
3 you don’t really think about every day if you have always had a place to live. The thing that I have
4 learned through volunteering with Habitat is everybody doesn’t have a roof over their head. But
5 what I love about Habitat is that it provides that basic first step that creates a haven and a safe
6 place.”

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8 42. Brooks’ wife Ms. Yearwood has publicly said about Brooks’ volunteer work with
9 Habitat for Humanity, the following, “With Garth, ‘generous’ is the word that comes to mind. He
10 really takes joy in helping others. I think Habitat fits him perfectly because it gives him a chance
11 to do all the things that he is just so good at naturally.”

12 43. Brooks, through his foundation, built a playroom inside UCLA Mattel Children’s
13 Hospital that he said the following about, “This is a Child Life Zone, and what I love about Child
14 Life Zones is it’s the one place in the hospital that doctors are not allowed,..... if you’ve got a child
15 that needs care, what happens to the brothers and sisters? Well, they come down here and they get
16 to be brothers and sisters together here.” Brooks helped to build more than 15 children life zones
17 in hospitals across the country.

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19 44. Helping children and building houses are not the only charities Brooks has
20 dedicated resources to, he also helps support cancer research, has held concerts to fundraise for
21 public television stations, such as Austin PBS, and even made a surprise appearance at the
22 Nashville Unlimited Christmas concert, held at Christ Church Cathedral to benefit a nonprofit in
23 Nashville.

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25 45. In 2024, Brooks performed on Mother’s Day at the Vatican as part of the World
26 Meeting on Human Fraternity, organized under the theme of #BeHuman, in the atrium of St. Peter's
27 Basilica.

1 46. In connection with his performance at President Biden’s 2021 inauguration, Brooks
2 said it was about “reaching across and loving one another.”

3 47. Brooks devotes countless hours and resources to showing the public this side of
4 himself. Brooks wants his fans to believe that this charitable person is who he is on stage and off.

5 48. As these allegations demonstrate, there is nothing loving, safe or charitable about
6 what Brooks subjected Ms. Roe.

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8 **II. Background: Ms. Roe**

9 49. Ms. Roe is a professional make-up artist and hair stylist, who has worked in the
10 music industry for more than thirty years. Her work garnered her a loyal list of clients, many of
11 whom are household names.

12 50. Through her hard work, skill and dedication, Ms. Roe has performed the hair styling
13 and make-up for celebrities appearing in countless publications such as Rolling Stone, Vanity Fair,
14 In Style, Esquire and Nash Magazine. Additionally, she has received numerous credits in
15 advertising campaigns involving top celebrities and brands, and for her work in television
16 commercials, and films.

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18 51. Throughout her career, Ms. Roe has collaborated with many of the top professional
19 photographers in the world.

20 52. Unfortunately, in late 2018, the pressure on Ms. Roe to provide financial support
21 for her family increased, and she needed to take on as much work as she could handle. Ms. Roe
22 shared her financial challenges with Brooks and his wife.

23
24 **III. Brooks Preys on Ms. Roe’s Hardship**

25 53. As part of her work for Brooks, Ms. Roe travelled to stadiums for concerts, such as
26 to Notre Dame as part of his tour in October 2018, and to studios for filming for commercials and
27 interviews, such as in December 2018 to New York City for the CBS Morning Show.

1 54. She often performed work for him at the home he shared with his wife.

2 55. Brooks intentionally fondled, grabbed and kissed his wife in close physical
3 proximity to Ms. Roe, in a way that made Ms. Roe feel extremely uncomfortable.

4 56. In addition, Brooks would tell Ms. Roe that he thought it was “hot” to see his wife
5 be with another woman sexually, and implied that she could be the other woman. Although it was
6 disturbing, she did not respond to these suggestions. Ms. Roe had worked for Ms. Yearwood since
7 1999, and worried that Ms. Yearwood would hear things he was saying to Ms. Roe and be upset
8 with her – even though, of course, such behavior was initiated by Brooks.

9 57. For example, Brooks openly talked about sexual subjects in front of Ms. Roe,
10 including cunnilingus.

11 58. Brooks regularly changed his clothing in front of Ms. Roe, and often purposefully
12 exposed his genitals and buttocks to Ms. Roe, knowing that she would respond with a look of
13 horror and disgust.

14 59. In 2019, when she was at Brooks’ home to do his hair and make-up, Ms. Roe set up
15 her supplies in his bathroom as usual, but while she was setting up, Brooks started taking a shower
16 in front of her, then came out naked with an erection pointing directly at Ms. Roe.

17 60. In shock, before she knew what to do, he grabbed her hands and forced them onto
18 his erect penis.

19 61. Disgustingly, Brooks said that he wanted her to “go down on him” and he said he
20 had “fantasies of her going down on [him] with her glasses [on]” and him ejaculating “all over her
21 face.”

22 62. After this event, Brooks continued to repeat this particular sexual fantasy to Ms.
23 Roe, as well as other fantasies he had about her.
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1 63. Brooks sent Ms. Roe sexually explicit text messages and pressured her to engage
2 in sexting with him.

3 64. On too many occasions to list, Brooks would lasciviously stare at Ms. Roe’s breasts
4 and pressure Ms. Roe to open her shirt to allow him to physically touch her breasts for purposes
5 of his arousal, after which would then masturbate. Regarding this arousal conduct, Brooks said he
6 would “**take care of himself,**” meaning masturbate until orgasm, and also told Ms. Roe he could
7 not let her watch because, “**when I come, it’s gallons.**”
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9 65. Other sexually explicit remarks by Brooks included him telling Ms. Roe that he
10 had “**fucked multiple women in every corner of a hotel room**” “**white, black, brown, or**
11 **whatever,**” and also said that he had done so “**on every surface**” in a hotel room.

12 **IV. Sexual Assaults in California**

13 66. On April 30 to May 1, 2019, Ms. Roe travelled to San Francisco with Brooks to
14 do his make-up and hair styling for an event.

15 67. On May 11, 2019, Brooks asked her to work in Los Angeles for a tribute show for
16 Sam Moore. They left in the early morning hours from Nashville and arrived in Los Angeles and
17 went directly to the hotel.
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19 68. They were the only two passengers on his private jet, which was unusual. Once in
20 Los Angeles at the hotel, Ms. Roe was shocked to learn that he had booked only one hotel room,
21 and she did not have a separate room. When she dared to ask if she could have a separate room,
22 Brooks said “no.”
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24 69. Brooks wanted her isolated and alone, because he knew exactly what he was going
25 to do to her.

26 70. No other employees were on this trip for the same reason. Brooks planned his
27 attack well in advance.
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1 71. Suddenly to her horror, Brooks was standing in the doorway to the bedroom
2 without any clothes on. Brooks' fantasy about sexually violating Ms. Roe while she had her glasses
3 on was about to happen.

4 72. Brooks grabbed her hands and pulled her into the other room and onto the bed. Ms.
5 Roe, less than 5 feet and about 100 pounds, was no physical match for Brooks who is 6 feet, weighs
6 almost 300 pounds and regularly lifts weights.

7 73. Brooks' rape of Ms. Roe was painful and traumatic. Having no regard for her well-
8 being and intent on his own sexual gratification at the expense of Ms. Roe's physical, mental and
9 emotional trauma, at some point during the nightmare, Brooks even held her small body upside
10 down by her feet and penetrated her.

11 74. She was helpless to move from his grip and terrified at what was happening to her.
12 While he held her upside down, dangling by her ankles -- all the blood rushed to her head, causing
13 her to be dizzy and sick. Brooks said perverted things to Ms. Roe about his sexual prowess.

14 75. Brooks also repeatedly slammed his penis into her vagina causing Ms. Roe's back
15 to hit his body over and over with such force she felt as if he was breaking her in two.

16 76. Brooks insisted that Ms. Roe wear her eyeglasses while he carried out his sexual
17 assault fantasy demonstrating that he had thought about doing this far in advance of the May 11,
18 2019 trip to Los Angeles.

19 77. Knowing exactly what he was doing and the pain he was forcing her to endure
20 against her will, at one-point Brooks even said to Ms. Roe that he knew he was "hurting" her.

21 78. Disgustingly, this only caused him to drop her from the upside-down position and
22 forced her over to a small loveseat where, after placing her face down, Brooks engaged in other
23 acts too graphic to include in this Complaint.

24 79. She was terrified.

1 80. With cold disregard for Ms. Roe, when Brooks was finished, it was business as
2 usual for Brooks, and Ms. Roe worked quickly to style his hair and do his make-up for the event.

3 81. Ms. Roe was physically ill and already in pain by the time they flew back to
4 Nashville. In fact, a migraine had already started.

5 82. In the weeks after this horrific violence, Ms. Roe experienced debilitating pain in
6 her neck and lower back, which she sought medical treatment for. In addition, she had to seek
7 treatment from her ob-gyn for damage Brooks caused during the Los Angeles rape.

8 83. Sadly, during the summer of 2019, the trauma from Brooks's rape became so
9 unbearable for Ms. Roe that she planned to commit suicide. She felt hopeless and did not see how
10 she would move past what had happened. Fortunately, she did not act on her thoughts and managed
11 to continue to keep showing up and earning money to support her family.

12 84. She knew that she could not say anything to Brooks or anyone who worked for him
13 about what he had done.

14 85. This is why, when Brooks asked her to work with him at another job in Los Angeles,
15 she still agreed to go.

16 86. On October 28, 2019, Brooks had Ms. Roe travel with him back to California for
17 five days of work. On this trip back to Los Angeles for five days, Ms. Roe was terrified to be in a
18 hotel room with him again worried that he would force himself on her.

19 87. Fortunately, other employees were on the trip and in close proximity within the
20 hotel. However, this did not stop Brooks from repeatedly squeezing, touching and groping her
21 breasts any time he could. Brooks even made Ms. Roe open her shirt to expose her breasts to him
22 for this purpose of his own sexual gratification.

23 88. Her fears that he would subject her to unwanted sex were justified as one morning
24 when Ms. Roe went to Brooks' room to do his hair and make-up, he was on the bed, face down,
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1 wearing loose shorts and holding his crotch. The way he looked at her, Ms. Roe understood he
2 was making it clear that he wanted to do what he had done on May 11. She narrowly escaped
3 another sexual assault because he was running late and other people were waiting to pick him up.

4 89. Brooks did not hide that he was angry and upset with Ms. Roe for not allowing him
5 to sexually violate her.

6 90. After the sexual assault and rape in Los Angeles, Brooks increased the frequency
7 of saying his sexual fantasies about her aloud, along with his physical gropings of her breasts
8 against her will. Disgistingly, he often forced her to do this while she was styling his hair and
9 doing his make-up.
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11 91. At times, Brooks implied the groping would continue despite Ms. Roe insisting this
12 was unwanted, for example, one time when he said while groping her, “next time we mess around,”
13 and Ms. Roe clearly said “no,” he became visibly angry at Ms. Roe and left. Ms. Roe, needing the
14 financial support from her work for Brooks, was petrified that her refusals would cause him to fire
15 her.
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17 92. Brooks increased the frequency of his sexually charged conversations with Ms.
18 Roe, and this included his repeated remarks about having a threesome with his wife in which he
19 implied that Ms. Roe would be the third person, which Brooks’ wife overheard on at least one
20 occasion, Ms. Roe believes.

21 93. In or about May 2020, Brooks, while speaking to his manager, Randy, and Ms.
22 Yearwood, directly in front of Ms. Roe talked about inventing a shampoo bottle that would double
23 as a dildo. When Ms. Roe became uncomfortable and would not join in the conversation Brooks
24 became upset and slammed both of his fists onto the kitchen counter-top so forcefully that items
25 were tossed around and he leaned in towards Ms. Roe and spoke in a threatening manner to her.
26 Following this incident, she was so upset that Ms. Roe sent a text to Brooks “I have thought a lot
27

1 about the conversation of last Monday. I can't work in an environment where explicit sexual
2 comments are made about shampoo bottles doubling as dildos. I mean you no harm, and if you
3 truly value my work, I am happy to show up tomorrow and/or whenever you may need my
4 services.”

5 94. After sending the text, she wrote him an email with the same content and copied
6 Ms. Yearwood on that email.

7 95. Additionally, during phone conversations in 2020, Brooks said, *inter alia*, the
8 following to Ms. Roe: After she told Brooks that she was upset he told his wife that Ms. Roe had
9 seen his penis, Brooks tried to minimize what was said, and said “Oh sweetheart – for one, I think
10 I know Trisha pretty well and she wasn't uncomfortable. And I said you saw my stuff.... that was
11 it...we were talking about something and it just came up. Look, I'm worried you are over thinking
12 this.”

13 96. After the sexual assault in Los Angeles, Brooks told Ms. Roe about a mysterious
14 text message he received in which a person claimed that Brooks had “**ruined his life.**” In a phone
15 conversation about this text, Brooks said he had “no idea” who had texted him the message and
16 suggested that he thought it was Ms. Roe's husband who had sent the text and tried to get her to
17 reveal her husband's phone number. Brooks told Ms. Roe, “I never want to hurt anybody so that
18 one [the mysterious text], it bothered me. *It bothered me.* I didn't know the number....”

19 97. Brooks' claim about the unknown text in which someone purportedly said he had
20 ruined his life, led to this exchange between he and Ms. Roe: Brooks: “And that killed me. It broke
21 my heart, like god, *I never want to hurt anybody.* So I was just – *I was scared to death.* And then,
22 you know, when they called you for work and you couldn't do it for two months I thought
23 ohhhhhhhh craaaap. That's what I thought. Oh crap. So, I was trying to seek you out to come talk
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1 ... or whatever I needed to do but just uh I don't want to hurt anybody, man. And just, **I just felt**
2 **bad."**

3 98. Ms. Roe said over the phone to Brooks, "I want to make sure that that even though
4 I've told you 'no,' that you're cool with 'no.' I mean 'no' as in 'no fooling around like we had
5 done' – you are cool with that? Right?"

6 99. Ms. Roe also said: "...when I saw you at the [redacted name of event] when you
7 were doing the [redacted event], you were pretty upset with me."

8 100. Brooks replied: "Nooooooo! I would never be upset with you.... look at it this way,
9 okay? Look at it – the best way I can explain it is: **Me and you broke into a jewelry store and**
10 **the second we broke the door we looked at each other and said this isn't right. But we already**
11 **had broken the door. And so, I think me and you get out and run and just hope that nobody**
12 **ever finds out and just love one another and be friends. Is that fair?"**

13 101. In his Abusive Mississippi Action, Brooks says Ms. Roe "falsely accused" him of
14 sexual misconduct. He will not be able to explain why he told her in 2020: "I work with the best.
15 And I don't want to do something stupid that breaks this team up. So ... I will do whatever I need
16 to do or do whatever I don't need to do. But I just want to keep working with you.... but if you
17 feel weird working with me, it's fine. We don't have to work together."
18

19 102. In response, Ms. Roe said, "I've never – found myself in a situation that is... I just
20 don't know that I'm going to be able to look up from ... And I'm frankly, **I am a little frightened**
21 **of you ... I really am."**

22 103. Brooks said, "Sweet baby! I'm so sorry. I can't imagine! **That makes me**
23 **frightened of you!"**

24 104. In this phone conversation, Ms. Roe explains that it would be "difficult" to work
25 with Brooks again, to which Brooks said, "I am asking you to work together forever," and "you
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1 have a place here as long as you want it. I'm lucky to have you ... I don't want this to go anywhere.
2 And I don't want something that happened in the moment to screw the whole 20 years I've known
3 you."

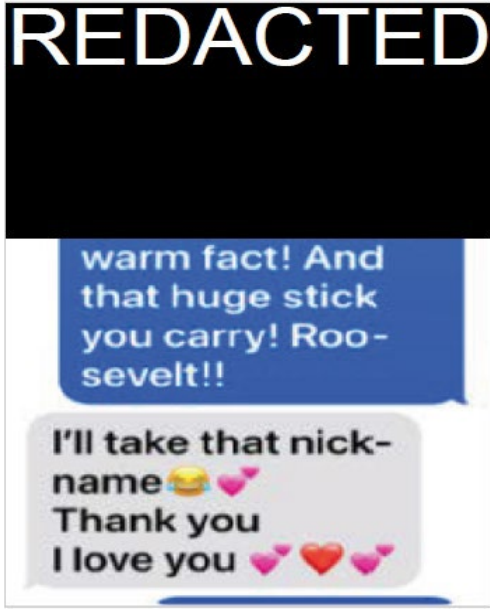
4 105. Brooks further said to Ms. Roe, "I love you to death honey, I don't ever want to see
5 you hurt, or cry or want or need for anything ... if you are down physically, if you need income,
6 please let me know – I want to help. ... if this situation happened a year ago, before me and you
7 did anything silly with each other, the answer would've been the same. Yes, let me help... I'm so
8 sorry that we crossed a line. I don't want to hurt anybody. I really don't."

9
10 106. In addition to phone calls, there were multiple text exchanges between Brooks and
11 Ms. Roe with sexually explicit content. Again, showing that Brooks knew exactly what he has
12 done to her, one day in 2020 when she was on site at a studio to style Brooks' hair and do his make-
13 up, he took her phone and deleted most of the text messages that he had sent to her.

14 107. Brooks uses more than one cell phone, and sometimes would use different "names"
15 and email addresses to communicate with Ms. Roe. He would tell Ms. Roe ahead of time that it
16 would be him sending her communications, under a different name. For example, in 2019 he texted
17 her to use a certain email address with a woman's name: "It will come back to you as [woman's
18 first name] [woman's last name] but that is me [smiley face emoji]."4

19
20 108. Although Brooks thought he deleted everything on Ms. Roe's phone, he did not,
21 and some texts remain, including those in which he encouraged Ms. Roe to speak in a sexualized
22 manner to him, such as this message referring to his "huge stick":
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26 _____
27 4 Because the woman's name he used is that of an employee, Ms. Roe has not included it
28 here.



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11 109. Based on the information set forth above, which is a sampling of some, but not all
12 of the acts Brooks subjected her to, it is obvious why he resorted to such a drastic measure as filing
13 the Abusive Mississippi Action.

14 110. Brooks is desperate to prevent his millions of fans from learning about the horrific
15 things he has said and done to a junior female employee who did nothing to deserve such
16 treatment.

17
18 111. Fortunately, Brooks is not entitled to misuse legal statutes, such as the Declaratory
19 Judgment Act to further harm Ms. Roe.

20 112. Ms. Roe's agency as a survivor and her ability to hold Brooks accountable for his
21 predatory behavior should not be thwarted by the preemptive Abusive Mississippi Action.

22 113. While Ms. Roe has been victimized again by Brooks, she commenced this action
23 to hold him accountable.
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FIRST CAUSE OF ACTION
(Assault)

114. Ms. Roe incorporates herein by reference, as though set forth in full, all preceding paragraphs of this Complaint.

115. Brooks intentionally and without consent caused harmful or offensive contact with Ms. Roe, including by intentionally bringing her to California for work in 2019 and purposefully isolating her from other employees.

116. Brooks ensured ahead of time that he would force Ms. Roe to share a hotel suite with him where, as detailed above, he subjected her to unwanted sexual intercourse, and sexually assaulted and raped her for his own sexual gratification.

117. As a result, Ms. Roe has suffered and will continue to suffer mental and physical pain and suffering.

SECOND CAUSE OF ACTION
(Battery – Civil Sexual Assault)

118. Ms. Roe incorporates herein by reference, as though set forth in full, all preceding paragraphs of this Complaint.

119. Brooks committed a battery against Plaintiff when he engaged in unlawful, intentional and offensive touching or application of force to Plaintiff’s person when he forced her to engage in sex against her will. Brooks ensured ahead of time that he would force Ms. Roe to share a hotel suite with him where she was isolated and defenseless.

120. Brooks held her by her ankles upside-down, restricting her ability to move or fight back in any manner. Brooks penetrated her vagina with his penis and subjected her to forced oral sex against her will. Brooks did this for his own sexual gratification.

1 128. Defendant Brooks committed a sexual battery under Cal. Civ. Code § 1708.5 when
2 he intended to and did cause harmful and/or offensive contact with intimate parts of Ms. Roe, and
3 his sexually offensive contact included when he forced her to engage in sex against her will.
4 Brooks ensured ahead of time that he would force Ms. Roe to share a hotel suite with him where
5 he kept her isolated and defenseless.

6 129. Brooks held her by her ankles upside-down, restricting her ability to move or fight
7 back in any manner. Brooks penetrated her vagina with his penis and subjected her to forced oral
8 sex against her will. Brooks did this for his own sexual gratification.

9 130. Plaintiff did not act freely and voluntarily, and the actions were against Plaintiff's
10 will. Brooks knew that he was subjecting her to pain and trauma, as detailed above.

11 131. Additionally, Defendant Brooks committed a rape against Plaintiff, as defined in
12 Cal. Penal Code § 261.

13 132. Plaintiff also was incapable of resisting because of Brooks sheer physical size and
14 strength as compared to Ms. Roe.

15 133. As a result of Defendant's alleged conduct, Plaintiff has suffered severe physical
16 harm, emotional distress, humiliation, embarrassment, anxiety, economic harm and other
17 consequential damages.

18 134. The conduct of Defendant Brooks described above was willful, wanton and
19 malicious. At all relevant times, Defendant acted with conscious disregard of Plaintiff's rights and
20 feelings, acted with knowledge of or with reckless disregard for the fact that his conduct was
21 certain to cause injury and/or humiliation to Plaintiff, and intended to and did cause fear, physical
22 injury and/or pain and suffering to Plaintiff. By virtue of the foregoing, Plaintiff is entitled to
23 recover punitive and exemplary damages from Defendant according to proof at trial.

24 135. This cause of action is timely under California's Sexual Abuse and Cover-Up
25 Accountability Act, AB 2777 because it is "based on conduct that occurred on or after January 1,
26 2009, and is commenced []after January 1, 2019," and is thereby revised by Cal. Code Civ. Proc.
27 § 340.16(b)(3).

1 136. As a result, Ms. Roe has suffered and will continue to suffer mental and physical
2 pain and suffering.

3 **FOURTH CAUSE OF ACTION**
4 **(Bane Act - Cal. Civ. Code § 52.1)**

5 137. Ms. Roe incorporates herein by reference, as though set forth in full, all preceding
6 paragraphs of this Complaint.

7 138. At all relevant times herein, Brooks interfered or attempted to interfere by threat,
8 intimidation or coercion and by physical force, with Ms. Roe's exercise or enjoyment of her right
9 to be free from sexual assault and sex discrimination as secured by the laws of California.

10 139. As a result, Ms. Roe has suffered and will continue to suffer mental and physical
11 pain and suffering.

12 **FIFTH CAUSE OF ACTION**
13 **(Ralph Act - Cal. Civ. Code § 51.7)**

14 140. Ms. Roe incorporates herein by reference, as though set forth in full, all preceding
15 paragraphs of this Complaint.

16 141. At all relevant times herein, and on May 11, 2019, Brooks committed a violent act
17 against Ms. Roe, motivated by her sex, by penetrating her vagina with his penis without her
18 consent, in that he would not and could not have committed the same violence against a man, and
19 that violent act was a substantial factor in the resulting physical and mental harm suffered by Ms.
20 Roe.

21 142. Defendant Brooks committed a rape against Plaintiff, as defined in Cal. Penal Code
22 § 261.

23 143. Defendant Brooks also intentionally subjected her to unwanted oral sex against her
24 will.

25 144. Brooks further subjected Ms. Roe to unwanted forced sexual groping, touching,
26 squeezing of her breasts, forced exposure of her breasts to him for his sexual gratification,
27 including on the five-day trip to Los Angeles beginning on October 28, 2019.
28

1 145. As a result, Ms. Roe has suffered and will continue to suffer mental and physical
2 pain and suffering.

3 **SIXTH CAUSE OF ACTION**
4 **(Gender Violence - Cal. Civ. Code § 52.4(c)(2))**

5 146. Ms. Roe incorporates herein by reference, as though set forth in full, all preceding
6 paragraphs of this Complaint.

7 147. At all relevant times herein, on May 11, 2019 in Los Angeles, Defendant Brooks
8 committed a rape against Plaintiff, as defined in Cal. Penal Code § 261, and he did so for the
9 purpose of arousal, gratification or abuse against her will and by force and is therefore liable for
10 gender violence.

11 148. As set forth above in detail, Defendant Brooks also subjected her to unwanted oral
12 sex against her will.

13 149. Brooks further subjected Ms. Roe to unwanted forced sexual groping, touching,
14 squeezing of her breasts, forced exposure of her breasts to him for his sexual gratification,
15 including on the five-day trip to Los Angeles beginning on October 28, 2019.

16 150. As a result, Ms. Roe has suffered and will continue to suffer mental and physical
17 pain and suffering.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that the Court enter judgment in her favor and against Defendant Brooks for the following relief:

- A. For monetary and/or compensatory damages.
- B. For punitive damages/exemplary damages according to proof and pursuant to Civil Code § 1708.5(3)(b);
- C. For attorney’s fees and/or penalties pursuant to Civil Code § 1708.5(3)(b), and Civil Code § 51.7, 52 and 52.4;
- D. For costs of suit herein incurred; and
- E. For such other and further relief as the court may deem proper.

JURY DEMAND

Plaintiff hereby demands a trial by jury on all triable issues.


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Dated: October 3, 2024


Respectfully submitted,

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