



CASE NO: A-24-908373-C
Department 13

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DISTRICT COURT

CLARK COUNTY, NEVADA

14 KYOHEI IIDA, an individual,
15
Plaintiff,
16
vs.
17 JOHNNY & ASSOCIATES, INC., A
FOREIGN CORPORATION; THE ESTATE
OF JOHNNY KITAGAWA; STARTO
18 ENTERTAINMENT, INC., A FOREIGN
CORPORATION; SMILE-UP, INC., A
19 FOREIGN CORPORATION; THE ESTATE
OF MARY K. FUJISHIMA; JULIE KEIKO
20 FUJISHIMA, AN INDIVIDUAL; KIKUE
IZU, AN INDIVIDUAL; MASAMI YAZAKI,
21 AN INDIVIDUAL; SUGURU SHIRHASE,
AN INDIVIDUAL; TSUGUO YADA, AN
22 INDIVIDUAL; MGM RESORTS
INTERNATIONAL, LLC, A FOREIGN
23 LIMITED LIABILITY COMPANY; DOE
Individuals 1–10; DOE Employees 11–20; and
24 ROE Corporations 21–30,
Defendants.

Case No.:
Dept. No.:

1 **COMPLAINT**

2 Plaintiff, Kyohei Iida, by and through counsel, J. Cogburn Law and Ziegler, Ziegler &
3 Associates, alleges as follows:

4 **PARTIES, JURISDICTION, VENUE**

5 1. At all times relevant hereto, Plaintiff, Kyohei Iida (“Plaintiff”), was, and continues
6 to be, a thirty-seven (37) year old male residing in Japan.

7 2. At all times relevant hereto, Defendant Johnny & Associates, Inc. (“Johnny &
8 Associates”) is a Japanese corporation that began operations in or about 1962 and was formally
9 incorporated in Japan in 1975. Johnny & Associates ceased operations in 2023.

10 3. At all times relevant hereto, Defendant Johnny Kitagawa (“Kitagawa”) was the
11 founder of Johnny & Associates and served as a chief executive officer (“CEO”) from 1975 until
12 his death in 2019. Kitagawa’s estate is comprised of his ownership interest in Johnny & Associates
13 and its successor corporations, as well as other assets.

14 4. At all times relevant hereto, Defendant STARTO ENTERTAINMENT, Inc.
15 (“STARTO”) is a Japanese corporation formed in 2023 and is the successor corporation to Johnny
16 & Associates.

17 5. At all times relevant hereto, Defendant Smile-Up, Inc. (“Smile-Up”) is a Japanese
18 corporation formed in 2023 by a former director of Johnny & Associates is also a successor
19 corporation to Johnny & Associates.

20 6. At all times relevant hereto, Defendant Mary K. Fujishima (“MKF”) was Johnny
21 Kitagawa’s sister, a holder of significant equity in Johnny & Associates and a longtime member
22 of Johnny & Associate’s board of directors until her death in 2021. MKF served as CEO of Johnny
23 & Associates from 2014 to 2021. MKF’s s estate includes the value of her equity interest in Johnny
24 & Associates as well as other assets.

1 7. At all times relevant hereto, Defendant Julie Keiko Fujishima (“JKF”) is Mary K.
2 Fujishima’s daughter and Johnny Kitagawa’s niece, and she served as a long-time employee and
3 director of Johnny & Associates and served as CEO of Johnny & Associates from 2021 to 2023.

4 8. At all times relevant hereto, Defendant Kikue Izu (“Izu”) was a director of Johnny
5 & Associates from 1983 at the latest until 2023.

6 9. At all times relevant hereto, Defendant Masami Yazaki (“Yazaki”) was a director
7 of Johnny & Associates from 1995 at the latest until 2023.

8 10. At all times relevant hereto, Defendant Suguru Shirahase (“Shirahase” or referred
9 to collectively with Izu, Yazaki as the “Directors”) was a director of Johnny & Associates from
10 1996 until 2023 and he was appointed as CEO of Johnny & Associates in 2023.

11 11. At all times relevant hereto, Defendant Tsugio Yada (“Yada”) served as long time
12 legal counsel to both Johnny Kitagawa and Johnny & Associates.

13 12. At all times relevant hereto, Defendants, Johnny & Associates, Kitagawa,
14 STARTO, Smile-Up, MFK, JKF, the Directors and Yada are collectively referred to herein as the
15 “Johnny Defendants”.

16 13. At all times relevant hereto, Defendant, MGM Resorts International, LLC
17 (“MGM”), was a foreign entity doing business in Nevada as successor in interest to Mirage
18 Resorts, Inc. and MGM Grand Inc, collectively referred to herein as “Mirage”.

19 14. Defendants named, referenced or designated herein as Doe Individuals 1–10 are
20 individuals whose true names and capacities are unknown to the Plaintiff and are, therefore, sued
21 by their fictitious names. Upon information and belief, each of these Defendants is responsible in
22 some manner for the events and happenings referenced herein and, in some manner, caused the
23 injuries and damages arising proximately from the subject incident described further herein.
24 Plaintiff will seek leave to amend this Complaint as the true identities of these individuals become
25 known.

1 15. Defendants designated as Roe Corporations 11–20 are entities whose true names
2 and capacities are unknown to Plaintiff and are, therefore, sued by their fictitious names. Upon
3 information and belief, each of these Defendant entities is responsible in some manner for the
4 events and happenings referenced herein and, in some manner, caused the injuries and damages as
5 herein alleged. Plaintiff will seek leave to amend this Complaint as the true identities of these
6 entities become known.

7 16. All acts and occurrences giving rise to this action took place in Clark County,
8 Nevada.

9 17. Nevada courts hold personal jurisdiction over the Defendants pursuant to the
10 Defendants' actions and purposeful contacts with the State of Nevada.

11 18. Venue in the Eighth Judicial District Court in and for the County of Clark, State of
12 Nevada, is proper pursuant to NRS 13.040.

13 **PRELIMINARY STATEMENT**

14 19. This case involves one of the largest and longest running child sexual abuse
15 schemes in modern history.

16 20. The acts of child sexual abuse at the heart of such scheme spanned decades and
17 involved hundreds and perhaps thousands of children.

18 21. Such acts of sexual abuse and sodomy occurred in both Japan and in the United
19 States.

20 22. The specific acts of sexual abuse that form the basis of Plaintiff's legal claims
21 herein occurred in August 2002 when Plaintiff was fourteen years old.

22 23. The horrific nature of the sexual abuse suffered by Plaintiff has caused Plaintiff to
23 suffer significant past and continuing mental and physical damages for more than twenty years.

24 24. The individual who committed the acts of sexual abuse and sodomy upon the then
25 minor Plaintiff in Las Vegas, Nevada was named Johnny Kitagawa.

1 25. Johnny Kitagawa, born in Los Angeles, California and a United States citizen by
2 birth, would become one of the most recognizable and powerful public figures in Japan.

3 26. Johnny Kitagawa’s sexual abuse and sodomy upon Plaintiff was facilitated and
4 supported by several individuals and the corporation, Johnny & Associates.

5 27. These individuals and Johnny & Associates. Inc. were not only negligent in
6 protecting the Plaintiff from suffering sexual abuse and sodomy, these individuals and Johnny &
7 Associates Inc. engaged in a decades long conspiracy to prevent the discovery of and/or cover up
8 Johnny Kitagawa’s horrendous child sexual abuse of Plaintiff and others.

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

10 **KITAGAWA AND THE BIRTH OF J-POP**

11 28. Kitagawa was born in Los Angeles, California in 1931.

12 29. Kitagawa spent the first two years of his life in California and moved to Japan in
13 1933.

14 30. Following the end of World War II, Kitagawa returned to Los Angeles in 1947,
15 attended college, and worked in a theater where he began to develop an interest in the
16 entertainment industry.

17 31. In 1952, Kitagawa returned to Japan and, as an American citizen, was drafted into
18 the United States military for service in the Korean War.

19 32. In 1962, Kitagawa formed an entertainment agency named “Johnny’s Office” for
20 the purpose of training young boys to sing and dance.

21 33. Johnny’s Office would eventually begin operating under the corporate name
22 “Johnny & Associates” beginning in 1975.

23 34. Kitagawa’s first “act” was a group of four junior high school boys.

24 35. In 1963, Kitagawa was accused of sexually assaulting one of the boys he was
25 training, but despite such accusation, Kitagawa’s business continued to grow.

1 36. Throughout the 1960s and 1970s, Kitagawa used the corporate entity Johnny &
2 Associates to focus on the development of young male entertainers who would be grouped together
3 into bands.

4 37. These boy bands were made up generally of minor boys between the ages of eleven
5 and sixteen.

6 38. Kitagawa’s development, through Johnny & Associates, of boy bands in Japan was
7 modeled after and inspired by music culture from the United States.

8 39. These boy bands would eventually form a pool of entertainers that Johnny &
9 Associates labeled “Johnny’s Jr.”

10 40. For purposes of marketing, Johnny & Associates wanted Johnny’s Jr. to be closely
11 identified with American pop culture and the American music industry.

12 41. To facilitate such marketing in Japan, Kitagawa, through Johnny & Associates,
13 would arrange for Johnny’s Jr. performers, meaning minor boys, to travel with Kitagawa into the
14 United States for photoshoots and musical performances.

15 42. Kitagawa accompanied Johnny’s Jr. on Johnny & Associates marketing trips to
16 several American states and territories, including California, Nevada, Hawaii, New York and
17 Guam.

18 43. In the 1980s, the style of music known as Japanese pop music or “J-Pop” exploded
19 in popularity in Japan.

20 44. Johnny & Associates, through their marketing and promotion of Johnny’s Jr. boy
21 bands, was at the forefront of the expanding popularity of J-Pop in Japan and around the world.

22 45. Johnny’s Jr. boy band members became cultural icons in Japan whose influence
23 extended well beyond the music industry and played a significant role in shaping all aspects of
24 Japanese youth culture from the 1980s all the way into the 2000’s.

25

1 46. Johnny & Associates, through Kitagawa, exercised absolute professional and
2 financial control over all of Johnny's Jr. performers.

3 47. Kitagawa had absolute authority over who would become a member of Johnny's
4 Jr. and over what opportunities would be provided to individual members of Johnny's Jr. once they
5 joined.

6 48. Because of the tremendous popularity of J-Pop bands throughout the Japanese
7 culture, Johnny & Associates, through Kitagawa and others, wielded enormous power by
8 controlling access to Johnny's Jr. performers.

9 49. In every sense, Kitagawa had the power to make minor boys significant "stars" in
10 Japan and he also had the power to marginalize or terminate any member of Johnny's Jr. at any
11 time.

12 50. The pressure on the minor boys in Johnny's Jr. to follow Kitagawa's orders and to
13 please Kitagawa was overwhelming.

14 51. By granting Kitagawa absolute control over the lives of minor boys, Johnny &
15 Associates created an environment that was ripe for sexual abuse.

16 **PLAINTIFF JOINS JOHNNY'S JR.**

17 52. Plaintiff was born on November 18, 1987 and grew up in Tokyo, Japan.

18 53. Plaintiff's father worked as a stage director, and his mother taught dance.

19 54. Plaintiff had two younger siblings, and growing up he was outgoing and had many
20 friends.

21 55. Plaintiff enjoyed dancing as a child and took lessons at his mother's studio.

22 56. When Plaintiff was starting junior high school in 2001, he told his parents that he
23 wanted to follow in his father's footsteps and become a stage director and to dance on stage.

24 57. In 2001, a friend of his mother suggested that Plaintiff try out for Johnny's Jr.
25

1 58. This family friend submitted an application on Plaintiff's behalf to Johnny's Jr.,
2 and Plaintiff was invited to audition.

3 59. Plaintiff auditioned with about forty other boys between approximately twelve to
4 fifteen years old.

5 60. At the audition, Plaintiff met an older Japanese man who was in charge of the
6 audition process and later learned that this older man was Kitagawa.

7 61. Following the audition, Plaintiff was invited to join Johnny's Jr.

8 62. Once Plaintiff joined Johnny's Jr., he learned he would be interviewed for
9 magazines, make television appearances and dance back up at concerts for more senior boy band
10 groups.

11 **PLAINTIFF IS SEXUALLY ASSAULTED BY KITAGAWA**

12 63. In September 2001, Plaintiff was involved in training and rehearsals with other
13 members of Johnny's Jr. on a Saturday evening and was invited for dinner.

14 64. As dinner was ending, Kitagawa suggested that due to the fact that it was "getting
15 late" Plaintiff and other Johnny's Jr. members should stay at his home overnight.

16 65. Plaintiff called his mother to ask for permission to stay overnight. On this call,
17 Kitagawa assured Plaintiff's mother that Plaintiff would be safe under his supervision.

18 66. Kitagawa's home had two upstairs bedrooms that were filled with mattresses and/or
19 futons.

20 67. Such upstairs bedrooms are where Kitagawa instructed Plaintiff and the other
21 Johnny's Jr. members to sleep.

22 68. Plaintiff woke to the feeling of someone rubbing his legs.

23 69. Plaintiff was frightened when he realized the person rubbing his legs was Kitagawa,
24 and Plaintiff pretended to be asleep in the hopes that Kitagawa would leave him alone.

25

1 70. Kitagawa continued to rub Plaintiff’s body and eventually inserted Plaintiff’s penis
2 into his mouth to sexually assault him.

3 71. Plaintiff was thirteen years old and had no prior exposure to sexual contact of any
4 kind prior to Kitagawa sodomizing him.

5 72. Plaintiff was left confused and scared by Kitagawa’s sexual attack upon him and
6 Plaintiff’s confusion and fear was only enhanced when in the morning when Kitagawa behaved as
7 if nothing had happened.

8 73. It was clear to Plaintiff, based upon the matter-of-fact manner in which the other
9 minor boys in Johnny’s Jr. were asking him if Kitagawa had sexually assaulted him, that Kitagawa
10 was also sexually assaulting the other members.

11 **KITAGAWA BEGINS REGULARLY SEXUALLY ASSAULTING PLAINTIFF**

12 74. Plaintiff began to receive a gradually increasing workload as a member of Johnny’s
13 Jr.

14 75. As Plaintiff’s workload increased, Plaintiff began to recognize a pattern of conduct
15 by Kitagawa toward him.

16 76. If Plaintiff agreed to have dinner at Kitagawa’s house and stay the night, Plaintiff
17 would remain one of Kitagawa’s “favorites” and would receive greater opportunities within
18 Johnny’s Jr., which included appearing in print media, appearing on television and being assigned
19 as a member of a boy band.

20 77. Plaintiff would stay at Kitagawa’s home between two and four times a month, and
21 on almost every occasion Plaintiff stayed, Kitagawa would sexually assault Plaintiff.

22 78. By 2002, Plaintiff was staying at Kitagawa’s home most weekends and was being
23 sexually assaulted by Kitagawa as many as four times each weekend.

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1 79. Kitagawa's regular sexual assaults upon Plaintiff included Kitagawa engaging in
2 oral sodomy upon Plaintiff, Kitagawa licking Plaintiff's anus and Kitagawa sticking his fingers
3 into Plaintiff's anus.

4 80. Plaintiff and the other members of Johnny's Jr. would talk regularly and openly
5 about Kitagawa sexually assaulting them, and it was clear to Plaintiff, due to the behavior of all
6 the adults who worked for Johnny & Associates who were aware of such conversations, that it was
7 common knowledge at Johnny & Associates that Kitagawa was regularly sexually assaulting the
8 members of Johnny's Jr.

9 81. Plaintiff was resigned to the fact that if he wanted to remain in Johnny's Jr., he
10 would be forced to submit to being regularly sexually assaulted by Kitagawa, and this appeared to
11 be the attitude of all the other members of Johnny's Jr.

12 **PLAINTIFF REJECTS KITAGAWA'S SEXUAL ASSAULT**

13 82. In or about April 2002, Plaintiff began dating a girl at his junior high school, and
14 this relationship caused Plaintiff to have a greater understanding of the boundaries of an
15 appropriate physical relationship.

16 83. Plaintiff began to be revolted by Kitagawa's sexually assaultive behavior toward
17 him, and in or about May 2002, Plaintiff refused to submit to being sexually assaulted by Kitagawa
18 by pushing Kitagawa away from him and not allowing Kitagawa to touch his genitals.

19 84. The morning after Plaintiff rejected Kitagawa's sexual assault, Kitagawa stopped
20 speaking to Plaintiff and began to completely ignore him.

21 85. Since Plaintiff was still part of a Johnny Jr.'s boy band, he continued to rehearse
22 and perform, but it was clear to Plaintiff that he was no longer one of Kitagawa's favorites.

23 86. Other members of Johnny's Jr. began to distance themselves from Plaintiff, and
24 Plaintiff later learned that Kitagawa created a false story that Plaintiff was caught stealing money
25 from Kitagawa as a means to cause other members of Johnny's Jr. to ostracize Plaintiff.

1 87. The stress caused by being ignored by Kitagawa and being ostracized by the other
2 members of Johnny’s Jr. caused Plaintiff’s relationship with his family to become significantly
3 strained and caused Plaintiff to suffer severe depression that sometimes-prevented Plaintiff from
4 being able to wake up in the morning to attend school.

5 **KITAGAWA TAKES PLAINTIFF TO LAS VEGAS**

6 88. After ignoring Plaintiff for several months, Kitagawa called Plaintiff’s mother to
7 ask how Plaintiff was doing and informed Plaintiff’s mother that he wanted to take Plaintiff on a
8 promotional trip to the United States.

9 89. Plaintiff was confused as to why Kitagawa was suddenly interested in bringing him
10 on a trip to the United States. However, Plaintiff decided to join the trip expecting that Kitagawa
11 had changed his attitude toward Plaintiff.

12 90. On the day of the departure to Las Vegas, Plaintiff was pleased to find that
13 Kitagawa and the other members of Johnny’s Jr. began to treat him kindly again , but Plaintiff was
14 also afraid that if he rejected Kitagawa’s sexual assaults again, he would once again be ostracized.

15 91. Plaintiff flew from Japan to Las Vegas with Kitagawa and other members of
16 Johnny’s Jr., and they arrived in Clark County, Nevada on August 16, 2002.

17 92. Plaintiff was fourteen years old on August 16, 2002.

18 93. Kitagawa was seventy-one years old on August 16, 2002.

19 94. Kitagawa brought Plaintiff and the other members of Johnny’s Jr. on the trip to the
20 Mirage Hotel for a three-night stay.

21 95. Kitagawa booked his own large room at the Mirage, and Plaintiff and the other
22 minor Johnny’s Jr. members were booked in rooms of three on the same floor as Kitagawa’s room.

23 96. On each of the three nights Plaintiff spend at the Mirage Hotel, August 16, 17 and
24 18, 2002, Kitagawa ordered Plaintiff to sleep in his room.

25

1 97. On August 16, 2002, Kitagawa performed oral sodomy upon Plaintiff, who was
2 them fourteen years old at the Mirage Hotel in Clark County, Nevada.

3 98. On August 17, 2002, Kitagawa performed oral sodomy upon Plaintiff, who was
4 them fourteen years old at the Mirage Hotel in Clark County, Nevada.

5 99. On August 18, 2002, Kitagawa performed oral sodomy upon Plaintiff, who was
6 them fourteen years old at the Mirage Hotel in Clark County, Nevada.

7 100. Following Plaintiff's August 2002 trip to the United States with Kitagawa, Plaintiff
8 returned to Japan.

9 101. Plaintiff remained a member of Johnny & Associates until 2006 and Kitagawa
10 continued to regularly sexually assault Plaintiff between 2002 and 2006. Kitagawa's sexual
11 assaults upon Plaintiff during that period included oral sodomy, anal sodomy and forcing Plaintiff
12 to put his penis in Kitagawa's anus.

13 102. As a result of being sexually abused by Kitagawa, Plaintiff has suffered post-
14 traumatic stress syndrome, depression, anxiety, paralysis and several other psychological and
15 physical conditions and symptoms consistent with those who have been the victims of childhood
16 sexual abuse.

17 **CORPORATE STRUCTURE AND OPERATION OF JOHNNY & ASSOCIATES**

18 103. From its formation in the early 1960's, Johnny & Associates was a closely held
19 family-owned business entity and eventually a closely held family-owned corporation beginning
20 in 1975.

21 104. Johnny & Associates only shareholders from the 1980's on were Kitagawa with a
22 50% ownership interest and MKF with a 50% ownership interest.

23 105. Following Kitagawa's death in 2019, MKF's daughter defendant JKF received
24 Kitagawa's 50% ownership interest in Johnny & Associates.

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1 106. Following MKF death in 2021, defendant JKF received 100% ownership of Johnny
2 & Associates.

3 107. Along with Kitagawa and MKF and JKF, the Directors played a significant role in
4 the operations of Johnny & Associates.

5 **KNOWLEDGE OF KITAGAWA’S HISTORY OF SEXUAL ABUSE OF MINORS AND**
6 **THE COVER-UP OF THE SAME**

7 108. Based upon the corporate structure of Johnny & Associates and the manner in
8 which Johnny & Associates operated, MKF, JKF and the Directors were fully familiar with the
9 fact that Kitagawa was permitted almost exclusive control over the daily activities of Johnny’s
10 Jr.’s minor boy members.

11 109. For example, for decades prior to 2001, MKF, JKF and the Directors, were fully
12 aware of and permitted Kitagawa to have members of Johnny Jr.’s spend the evening in Kitagawa’s
13 home.

14 110. For example, for decades prior to 2002, MKF, JKF and the Directors, were fully
15 aware of and permitted Kitagawa to take members of Johnny Jr.’s on trips within Japan and outside
16 of Japan where members of Johnny’s Jr. would stay in hotels with Kitagawa and be supervised by
17 Kitagawa alone.

18 111. Despite MKF, JKF and the Directors being fully aware in 2002 that Kitagawa had
19 a proven history of sexually abusing minor boys, MKF, JKF and the Directors permitted Kitagawa
20 to take Plaintiff to the Mirage Hotel in Las Vegas, Nevada in 2002.

21 112. In 1965, Kitagawa was the subject of court case that was reported upon in the media
22 concerning a “lewd act” Kitagawa performed on a minor boy.

23 113. In 1988, a minor and member of a boy band formed by Johnny & Associates named
24 the Four Leaves publicly accused Kitagawa of raping him and coercing him into other sex acts.

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1 114. In 1996, Hiramoto Junya, a member of Johnny’s Jr. published a book in Japan in
2 which he stated that he had observed Kitagawa raping another member of Johnny’s Jr. in a
3 communal bedroom at Kitagawa’s residence.

4 115. In 1999, a Japanese magazine named Shū kan Bunshun published a major series of
5 articles which included numerous accusations by former Johnny Jr. members that they had been
6 sexually assaulted by Kitagawa in his home and elsewhere.

7 116. The series of articles in Shūkan Bunshun were so widely read in Japan, that the
8 accusations in the series of articles became the subject of hearings in Japan’s parliament.

9 117. Kitagawa responded to the Shūkan Bunshun articles by suing the magazine for libel
10 in Tokyo District Court in 2000.

11 118. Kitagawa was represented in the libel action by Johnny & Associates’ then long
12 time attorney Yada.

13 119. Kitagawa’s libel case against Shūkan Bunshun was tried in Tokyo District Court in
14 2001 and twelve separate minor boys who had been members of Johnny’s Jr. testified that they
15 had been sexually assaulted by Kitagawa.

16 120. The Tokyo Court granted Kitagawa’s claim, reasoning that Shūkan Bunshun failed
17 to prove that the allegations were true. However, the Tokyo High Court reversed the decision,
18 reached a finding that Kitagawa was entitled to zero damages on his libel claim related to the
19 accusations of sexual abuse of minors because such accusations were found to be “largely true”.

20 121. Despite the series of articles in Shūkan Bunshun, the hearings in the Japanese
21 parliament and the decision of the Tokyo High Court all related to sexual abuse of minors by
22 Kitagawa, the Japanese media, police and entertainment industry ignored the enormous body of
23 readily available evidence that Kitagawa was a long-term active pedophile.

24 122. On January 30, 2000, the New York Times published an article concerning the
25 accusations against Kitagawa that were published in Shūkan Bunshun (the “NY Times Article”).

1 223. The NY Times Article contained their own report of a first-hand interview that they
2 did with a former member of Johnny’s Jr. who told the New York Times he had been raped by
3 Kitagawa in the 1970’s when he was twelve years old.

4 224. Kitagawa’s lawyer Yada was interviewed for the NY Times Article and was quoted
5 as saying the following:

6 - That the sexual abuse allegations against Kitagawa were a “*complete fabrication*”

7 - “*Johnny Kitagawa is a good person with a great reputation, and no one believes the lies*
8 *that were published*”.

9 - “*Writing a story based on the confession of people who are now separated from the talent*
10 *agency is not a reliable way of reporting.*”

11 225. The NY Times article also quoted a Japanese entertainment reporter who spoke
12 about Johnny & Associates ability to control the Japanese media’s reporting related to Kitagawa’s
13 sexual abuse of boys who stated the following:

14 - “*If you’re a television station and don’t comply with Johnny & Associates wishes then all*
15 *the popular stars will be withdrawn from your programs, your variety shows will not get*
16 *any interviews with celebrities, and your ratings will plummet...the same goes for*
17 *publications*”

18 226. Johnny & Associates used its vast power over the media to prevent widespread
19 media reporting on Kitagawa’s sexual abuse of minor boys.

20 227. However, even far earlier then 2001, the year Plaintiff joined Johnny Jr.,
21 Kitagawa’s sexual abuse of Johnny Jr. members was widely known by those within Johnny &
22 Associates management including, but not limited to MKF, JKF and the Directors.

23 228. Also, by 2001, Yada was fully aware that Kitagawa was a pedophile who had been
24 regularly sexually assaulting children employed by Johnny & Associates for decades.

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1 129. Despite the direct knowledge that Kitagawa was a dangerous sexual predator who
2 was regularly preying upon children, no one associated with Johnny & Associates including, but
3 not limited to, MKF, JKF, the Directors and Yada did anything to protect the Plaintiff or hundreds
4 of other minor boys from having their childhoods destroyed by Kitagawa’s relentless sexual abuse.

5 **KITAGAWA’S LONG-TERM SEXUAL ABUSE SCANDAL EXPLODES PUBLICLY**
6 **AND JOHNNY & ASSOCIATES FAILURE TO PROTECT CHILDREN BECOMES**
7 **WIDELY KNOWN**

8 130. Even after the publication of the articles in Shūkan Bunshun, the hearings in the
9 Japanese parliament and the findings of the Tokyo High Court, the Japanese mainstream media
10 were determined not to report any negative information about Kitagawa and Johnny & Associates.

11 131. Kitagawa was permitted to remain CEO of Johnny & Associates and remained a
12 publicly “respected” figure according to the Japanese media up until his death in 2019.

13 132. When Kitagawa died, he received a “farewell party” concert at the Tokyo Dome
14 and then Japanese Prime Minister Shinzo Abe sent a condolence message.

15 133. The façade of lies that protected Kitagawa and Johnny & Associates from public
16 accountability collapsed in March 2023 with the release of a documentary produced by the British
17 Broadcasting Company (“BBC”).

18 134. The BBC documentary entitled “Japan’s J-Pop Predator” (the “Documentary”) was
19 widely viewed in Japan and was shocking to the Japanese public who had been kept in the dark
20 for decades concerning Kitagawa’s sexual abuse of boys and Johnny & Associates role in
21 manipulating the Japanese media into assisting in covering up the nature and scale of Kitagawa’s
22 horrendous actions.

23 135. The Documentary provided firsthand accounts from many former Johnny Jr.
24 recounting the sexual abuse they suffered from Kitagawa and Johnny & Associates failure, despite
25 full knowledge of what was occurring, to do anything to stop Kitagawa.

1 136. The Japanese public was outraged by the Documentary and further outraged by the
2 fact that the Documentary had to be produced outside of Japan in order to bring attention to what
3 had been an open secret hidden by so many powerful people in Japan for decades.

4 137. The Documentary spurred hundreds of former Johnny Jr. members to bravely come
5 forward publicly to detail the sexual abuse they suffered from Kitagawa when they were minor
6 boys.

7 138. Those coming forward included Plaintiff.

8 139. Johnny & Associates' response to the Documentary was, as was typical, to deny
9 Kitagawa did anything wrong.

10 140. The public pressure created by the Documentary and the overwhelming evidence
11 against Kitagawa it helped shine a light on was too intense for Johnny & Associates to ignore, so
12 Johnny & Associates adopted the position that even if Kitagawa was involved in sexual abuse, no
13 one at Johnny & Associates was aware that such abuse was taking place.

14 141. Given the overwhelming evidence that Kitagawa's sexual abuse was common
15 knowledge to Johnny & Associates management and others including MKF, JKF., the Directors
16 and Yada, Johnny & Associates was forced to hire a third party to prepare a report about
17 Kitagawa's conduct and Johnny & Associates knowledge of the same.

18 142. Such third-party report was made public in Japan in August 2023 (the "Report").

19 143. The Report concluded that Kitagawa sexually abused perhaps as many as 1000
20 minor boys and that Johnny & Associates management including, but not limited to, MKF, JKF
21 and the Directors were aware of such sexual abuse and/or the significant allegations of such abuse,
22 did nothing to stop such abuse and actively engaged in schemes to cover-up such abuse.

23 144. The Report was very critical of the Japanese media's failure to expose Kitagawa's
24 behavior publicly and concluded that the Japanese media placed their concerns about TV ratings
25

1 and access to J-Pop celebrities above the physical and mental safety of children who were being
2 subjected to sexual abuse.

3 145. In October 2023, Johnny & Associates held a press conference in Japan in which
4 they announced various actions they were taking in response to the Report.

5 146. The steps included that Johnny & Associates was ceasing operations and that a new
6 entity named Smile-Up, Inc. would replace Johnny & Associates.

7 147. It was alleged at the press conference that the purpose of Smile-Up's would be to
8 create a system of compensation for the victims of Kitagawa's sexual abuse.

9 148. Like everything else that Johnny & Associates stated publicly, the formation and
10 purpose of Smile-Up was premised on lies.

11 149. Smile-Up was created as a public relations measure by JKF and the Directors to
12 attempt to relieve public pressure created by the Documentary and the Report.

13 150. After the demise of Johnny & Associates, all the significant assets of the former
14 Johnny & Associates were transferred to newly formed company named STARTO.

15 151. STARTO's purpose was to simply continue in the exact same business as Johnny
16 & Associates, that being the finding, hiring, training and promotion of J-Pop entertainers.

17 152. Johnny & Associates former management including, but not limited to JKF and the
18 Directors are now owners and/or part of the management of STARTO.

19 153. Smile-Up is merely a shell corporation with little or no real assets.

20 154. Smile-Up's established alleged "victims' compensation" system is a farce designed
21 to provide minuscule levels of compensation to victims who have experienced decades of mental
22 and physical damages as a result of suffering childhood sexual abuse by Kitagawa.

23 155. Smile -Up has made every effort possible to suggest to the Japanese public that
24 many of those who are coming forward to detail the sexual abuse they received at the hands of
25

1 Kitagawa are lying and only trying to collect the paltry levels of compensation being offered by
2 Smile-Up.

3 **FIRST CAUSE OF ACTION**

4 **(Sexual Battery against Kitagawa)**

5 156. Plaintiff incorporates by reference each and every allegation previously made in
6 this Complaint as if fully set forth herein.

7 157. Kitigawa's conduct was sexually offensive, despicable, willful, unlawful, and in
8 complete conscious disregard for the rights and safety of Plaintiff, constituting sexual battery.

9 158. Kitigawa used physical force and manipulation against Plaintiff when he sexually
10 battered Plaintiff.

11 159. The physical injuries and damage to Plaintiff, which may be permanent and
12 disabling in nature, have caused and may continue to cause Plaintiff significant pain and suffering.

13 160. As a result of the above-mentioned actions and injuries, Plaintiff has been required
14 and may yet be required to seek medical care and treatment.

15 161. Plaintiff's injuries have caused and may yet continue to cause Plaintiff to
16 experience significant suffering.

17 162. Plaintiff's harms and losses, to be fully set forth and proven at trial, were
18 proximately caused by Defendants' negligence.

19 163. As a direct and proximate result of Defendant's actions as described herein,
20 Plaintiff has been required to retain the services of an attorney, and therefore, is entitled to recover
21 reasonable attorney fees, costs of suit, and pre- and post-judgment interest, as applicable.

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SECOND CAUSE OF ACTION

(Negligence Against “Johnny Defendants”)

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3 164. Plaintiff incorporates by reference each and every allegation previously made in
4 this Complaint as if fully set forth herein.

5 165. At all times relevant hereto, “Johnny Defendants” owed a duty of care to Plaintiff
6 to keep him safe and secure from physical and emotional injuries.

7 166. At all times relevant hereto, “Johnny Defendants” knew, and reasonably
8 foreseeably should had known, that Plaintiff and other young boys were being subjected to sexual
9 abuse.

10 167. Based upon “Johnny Defendants” knowledge it was reasonably and foreseeable that
11 the acts as alleged would occur.

12 168. “Johnny Defendants” breached its duty of care when it negligently and/or carelessly
13 operated, managed, controlled and maintained control over Plaintiff, including, but not limited to
14 allowing Kitagawa to sexually abuse Plaintiff, thereby directly, legally, and proximately causing
15 injuries and damages to Plaintiff as alleged herein.

16 169. “Johnny Defendants” breached its duty of care to keep Plaintiff safe from harm by
17 creating a condition that resulted in sexual abuse and covering up the sexual abuse thereafter.

18 170. “Johnny Defendants” knew, or in the exercise of reasonable care, should have
19 known that the sexual abuse of Plaintiff was egregious, constituting a danger to Plaintiff and other
20 sexually abused young boys, and “Johnny Defendants” failed to take reasonable precautions to
21 prevent the sexual abuse as alleged herein.

22 171. As a direct, proximate, and legal cause of “Johnny Defendants” conduct, Plaintiff
23 has suffered injuries and damages including, but not limited to, severe emotional distress, and
24 psychological trauma.

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1 172. As a further direct and proximate result, Plaintiff has incurred expenses for medical
2 care and treatment in an amount to be proven at trial.

3 173. Plaintiff has been forced to retain the services of an attorney to represent them in
4 this action, and, therefore, is entitled to recover reasonable attorney fees and costs of litigation.

5 **THIRD CAUSE OF ACTION**

6 **(Negligence Against “Mirage” Defendant)**

7 174. Plaintiff incorporates by reference each and every allegation previously made in
8 this Complaint as if fully set forth herein.

9 175. At all times relevant hereto, “Mirage” owed a duty of care to Plaintiff to keep the
10 premises safe and secure from physical and emotional injuries.

11 176. At all times relevant hereto, “Mirage” knew, and reasonably foreseeably should had
12 known, that Plaintiff and other young boys were being subjected to sexual abuse by Kitagawa.

13 177. Upon information and belief, “Mirage” provided multiple hotel rooms to Kitagawa,
14 wherein young boys stayed in their own hotel room and Kitagawa stayed in a hotel suit.

15 178. Upon information and belief, “Mirage” enticed Kitagawa to stay at their hotel based
16 upon his social and media status in Japan along with his spending habits while in Las Vegas.

17 179. At the time Plaintiff was sexually abused the “Mirage” knew or should have known
18 about propensities of Kitagawa to sexually abuse young boys.

19 180. Based upon “Mirage” knowledge it was reasonably and foreseeable that the acts as
20 alleged would occur.

21 181. “Mirage” breached its duty of care when it negligently and/or carelessly operated,
22 managed, controlled and maintained control over the hotel, including, but not limited to allowing
23 Kitagawa to sexually abuse Plaintiff, thereby directly, legally, and proximately causing injuries
24 and damages to Plaintiff as alleged herein.

25

1 182. “Mirage” breached its duty of care to keep Plaintiff safe from harm by creating a
2 condition that resulted in sexual abuse and covering up the sexual abuse thereafter.

3 183. “Mirage” knew, or in the exercise of reasonable care, should have known that the
4 sexual abuse of Plaintiff was egregious, constituting a danger to Plaintiff and other sexually abused
5 young boys, and “Mirage” failed to take reasonable precautions to prevent the sexual abuse as
6 alleged herein.

7 184. “Mirage” benefited financially by the “Johnny Defendants” gambling at their hotel
8 and by the “Johnny Defendants” promoting their casino considering their social status in Japan
9 along with their media presence.

10 185. As a direct, proximate, and legal cause of “Mirage’s” conduct, Plaintiff has suffered
11 injuries and damages including, but not limited to, severe emotional distress, and psychological
12 trauma.

13 186. As a further direct and proximate result, Plaintiff has incurred expenses for medical
14 care and treatment in an amount to be proven at trial.

15 187. Plaintiff has been forced to retain the services of an attorney to represent them in
16 this action, and, therefore, is entitled to recover reasonable attorney fees and costs of litigation.

17 **FOURTH CAUSE OF ACTION**

18 **(Intentional Infliction of Emotional Distress Against All Defendants)**

19 188. Plaintiff incorporates by reference each and every allegation previously made in
20 this Complaint as if fully set forth herein.

21 189. The actions Defendants as described herein constitute negligent infliction of
22 emotional distress, emotionally impacting Plaintiff and causing Plaintiff to suffer shock and
23 serious emotional distress as a direct and proximate result thereof.

1 190. As a direct, proximate, and legal cause of the Defendants conduct, Plaintiff has
2 suffered injuries and damages including, but not limited to, severe emotional distress, and
3 psychological trauma.

4 191. As a further direct and proximate result, Plaintiff has incurred expenses for medical
5 care and treatment in an amount to be proven at trial.

6 192. Plaintiff has been forced to retain the services of an attorney to represent them in
7 this action, and, therefore, is entitled to recover reasonable attorney fees and costs of litigation.

8 **FIFTH CAUSE OF ACTION**

9 **(Negligent Infliction of Emotional Distress Against All Defendants)**

10 193. Plaintiff incorporates by reference each and every allegation previously made in
11 this Complaint as if fully set forth herein.

12 194. Defendants' intentional acts and omissions, as described above, were extreme and
13 outrageous to the point of being intolerable in a civilized society.

14 195. As a direct, proximate, and legal cause of the Defendants conduct, Plaintiff has
15 suffered injuries and damages including, but not limited to, severe emotional distress, and
16 psychological trauma.

17 196. As a further direct and proximate result, Plaintiff has incurred expenses for medical
18 care and treatment in an amount to be proven at trial.

19 197. Plaintiff has been forced to retain the services of an attorney to represent them in
20 this action, and, therefore, is entitled to recover reasonable attorney fees and costs of litigation.

21 **SIXTH CAUSE OF ACTION**

22 **(Violation of NRS 41.13965 Against All Defendants)**

23 198. Plaintiff incorporates by reference each and every allegation previously made in
24 this Complaint as if fully set forth herein.

25 199. Plaintiff is a victim of sexual abuse as defined by NRS 432B.100.

1 200. Through the acts and omissions described above, Defendants financially
2 benefited from a venture where they knew or should have known sexual abuse was taking place
3 against Plaintiff.

4 201. As a direct, proximate, and legal cause of the Defendants conduct, Plaintiff has
5 suffered injuries and damages including, but not limited to, severe emotional distress, and
6 psychological trauma.

7 202. As a further direct and proximate result, Plaintiff has incurred expenses for medical
8 care and treatment in an amount to be proven at trial.

9 203. Plaintiff has been forced to retain the services of an attorney to represent them in
10 this action, and, therefore, is entitled to recover reasonable attorney fees and costs of litigation.

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PRAYER FOR RELIEF

Wherefore, Plaintiff prays for the judgment of this Court as follows:

1. Awarding Plaintiff all available compensatory damages for each cause of action, including but not limited to past and future medical expenses; past and future lost wages and loss of earning capacity; past and future emotional distress; consequential and/or special damages; and all available noneconomic damages, including but not limited to pain, suffering, and loss of enjoyment of life, in an amount not less than **\$50,000,000**.
2. Punitive damages for the wonton, intentional and outrageous actions in an amount not less than **\$100,000,000**;
3. Disgorgement of profits and/or restitution;
4. Treble damages as allowed under Nevada law;
5. Costs of suit, pre-judgment interest, post-judgment interest, attorney fees; and
6. Such other and further relief as is just and proper.

Dated this 18th day of December, 2024.

J. COGBURN LAW

By: /s/Jamie S. Cogburn

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