



CASE NO: A-24-908372-C
Department 4

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DISTRICT COURT

CLARK COUNTY, NEVADA

14 JUNYA TANAKA, an individual,

15 Plaintiff,

Case No.:
Dept. No.:

16 vs.

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

25 Defendants.

COMPLAINT

1 Plaintiff, Junya Tanaka, by and through counsel, J. Cogburn Law and Ziegler, Ziegler &
2 Associates, alleges as follows:

3 **PARTIES, JURISDICTION, VENUE**

4 1. At all times relevant hereto, Plaintiff Junya Tanaka (“Plaintiff”), was born on July
5 13, 1981 and is forty-three (43) year old male residing in Japan.

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

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

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

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

19 6. At all times relevant hereto, Defendant Mary K. Fujishima (“MKF”) was Johnny
20 Kitagawa’s sister, a holder of significant equity in Johnny & Associates and a longtime member
21 of Johnny & Associate’s board of directors until her death in 2021. MFK served as CEO of Johnny
22 & Associates from 2014 to 2021. MKF’s s estate includes the value of her equity interest in Johnny
23 & 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 35. In 1963, Kitagawa was accused of sexually assaulting one of the boys he was
2 training, but despite such accusation, Kitagawa’s business continued to grow.

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

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

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

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

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

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

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

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

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

1 56. When Plaintiff was in junior high school and approximately 13 years old, his
2 mother submitted an application for him to join Johnny & Associates and Plaintiff received a notice
3 that he had been granted an audition.

4 57. Plaintiff was not selected for Johnny's Jr. at his audition, but he did receive a role
5 on a TV show that was also auditioning for talent at the same audition as Johnny & Associates.

6 58. While Plaintiff was working on the TV show in 1995, he was introduced to
7 Kitagawa.

8 59. Kitagawa invited Plaintiff, who was then 14 years old, to join Johnny's Jr. and
9 Plaintiff agreed.

10 60. When Plaintiff first joined Johnny's Jr., Plaintiff was living in Western Japan.

11 61. After being in Johnny's Jr. for about three months, Plaintiff received a call from
12 Kitagawa asking Plaintiff to come to Tokyo for training.

13 62. Plaintiff traveled to Tokyo on his own and received training by Kitagawa at TV
14 Asahi, a Japanese television network.

15 **PLAINTIFF IS SEXUALLY ASSAULTED BY KITAGAWA**

16 63. Following Plaintiff's first day of Johnny's Jr. training in Tokyo, Plaintiff was
17 instructed to go to Kitagawa's home for the evening and stay along with other members of
18 Johnny's Jr.

19 64. Kitagawa's home was a duplex apartment with two bedrooms on the second floor
20 that had many beds in each room.

21 65. Plaintiff was tired from his training and went to sleep in one of the bedrooms on
22 the second floor of Kitagawa's home.

23 66. As Plaintiff was sleeping next to another boy, Plaintiff felt someone touching him
24 and woke up to see Kitagawa was performing oral sodomy upon Plaintiff.

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1 67. When Kitagawa saw Plaintiff was awake, Kitagawa told Plaintiff not to speak and
2 Kitagawa continued to perform oral sodomy upon Plaintiff.

3 68. Plaintiff was terrified and remained still as possible and pretended to go back to
4 sleep.

5 69. After Kitagawa finished orally sodomizing Plaintiff, Plaintiff saw him begin
6 touching the boy next to Plaintiff.

7 70. In the morning after Kitagawa first sexually assaulted Plaintiff, Plaintiff reported
8 for training with other members of Johnny's Jr. and he was approached by two other members of
9 Johnny Jr. who asked him in an almost joking, matter of fact way if he had been raped by Kitagawa.

10 71. Plaintiff was shocked at the way these members of Johnny's Jr. were talking so
11 casually about being raped by Kitagawa and Plaintiff was left with the impression that Kitagawa
12 was raping other members of Johnny Jr.

13 **KITAGAWA BEGINS REGULARLY SEXUALLY ASSAULTING PLAINTIFF**

14 72. Plaintiff, due to the fact that he did not live in Tokyo, began to be required to spend
15 more time staying at Kitagawa's home to receive Johnny's Jr. training in Tokyo and work
16 assignments in Tokyo.

17 73. Plaintiff was spending between two to three nights each week in Tokyo in 1995
18 into 1996 and during these overnight stays, Plaintiff was repeatedly sexually assaulted by
19 Kitagawa.

20 74. The nature and intensity of Kitagawa's sexual assaults upon Plaintiff increased.

21 75. Kitagawa took advantage of the fact that Plaintiff was not attending school while
22 in Tokyo, so Plaintiff was often left alone with Kitagawa in Kitagawa's home while the other
23 Johnny's Jr. attended school.

24 76. Kitagawa repeatedly anally sodomized Plaintiff while Plaintiff was alone with
25 Kitagawa in his home.

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

3 88. On each day of Plaintiff’s stay at the Mirage Hotel in Las Vegas, Nevada in 1997,
4 Kitagawa sexually assaulted Plaintiff.

5 89. Kitagawa’s sexual assaults upon Plaintiff at the Mirage Hotel in Las Vegas, Nevada
6 in March 1997 included Kitagawa orally sodomizing Plaintiff and anally raping Plaintiff.

7 90. Following Plaintiff’s March 1997 trip to the United States with Kitagawa, Plaintiff
8 returned to Japan.

9 91. Plaintiff remained a member of Johnny & Associates until 1998.

10 92. Kitagawa continued to regularly sexually assault Plaintiff between 1997 and 1998.
11 Kitagawa’s sexual assaults upon Plaintiff during that period included oral sodomy and anal rape.

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

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

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

20 95. Johnny & Associates only shareholders from the 1980’s on were Kitagawa with a
21 50% ownership interest and MKF with a 50% ownership interest.

22 96. Following Kitagawa’s death in 2019, MKF’s daughter defendant JKF received
23 Kitagawa’s 50% ownership interest in Johnny & Associates.

24 97. Following MKF death in 2021, defendant JKF received 100% ownership of Johnny
25 & Associates.

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

4 107. The series of articles in Shūkan Bunshun were so widely read in Japan, that the
5 accusations in the series of articles became the subject of hearings in Japan’s parliament.

6 108. Kitagawa responded to the Shūkan Bunshun articles by suing the magazine for libel
7 in Tokyo District Court in 2000.

8 109. Kitagawa was represented in the libel action by Johnny & Associates’ then long-
9 time attorney Yada.

10 110. Kitagawa’s libel case against Shūkan Bunshun was tried in Tokyo District Court in
11 2001 and twelve separate minor boys who had been members of Johnny’s Jr. testified that they
12 had been sexually assaulted by Kitagawa.

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

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

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

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

1 115. Kitagawa’s lawyer Yada was interviewed for the NY Times Article and was quoted
2 as saying the following:

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

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

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

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

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

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

17 118. However, even far earlier then 1997, the year Plaintiff joined Johnny Jr.,
18 Kitagawa’s sexual abuse of Johnny Jr. members was widely known by those within Johnny &
19 Associates management including, but not limited to MKF, JKF and the Directors.

20 119. Also, by 1997, Yada was fully aware that Kitagawa was a pedophile who had been
21 regularly sexually assaulting children employed by Johnny & Associates for decades.

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

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

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

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

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

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

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

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

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

1 128. The Documentary spurred hundreds of former Johnny Jr. members to bravely come
2 forward publicly to detail the sexual abuse they suffered from Kitagawa when they were minor
3 boys.

4 129. Those coming forward included Plaintiff.

5 130. Johnny & Associates' response to the Documentary was, as was typical, to deny
6 Kitagawa did anything wrong.

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

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

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

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

20 135. The Report was very critical of the Japanese media's failure to expose Kitagawa's
21 behavior publicly and concluded that the Japanese media placed their concerns about TV ratings
22 and access to J-Pop celebrities above the physical and mental safety of children who were being
23 subjected to sexual abuse.

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

1 137. The steps included that Johnny & Associates was ceasing operations and that a new
2 entity named Smile-Up, Inc. would replace Johnny & Associates.

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

5 139. Like everything else that Johnny & Associates stated publicly, the formation and
6 purpose of Smile-Up was premised on lies.

7 140. Smile-Up was created as a public relations measure by JKF and the Directors to
8 attempt to relieve public pressure created by the Documentary and the Report.

9 141. After the demise of Johnny & Associates, all the significant assets of the former
10 Johnny & Associates were transferred to newly formed company named STARTO.

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

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

15 144. Smile-Up is merely a shell corporation with little or no real assets.

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

19 146. Smile -Up has made every effort possible to suggest to the Japanese public that
20 many of those who are coming forward to detail the sexual abuse they received at the hands of
21 Kitagawa are lying and only trying to collect the paltry levels of compensation being offered by
22 Smile-Up.

1 157. At all times relevant hereto, “Johnny Defendants” knew, and reasonably
2 foreseeably should had known, that Plaintiff and other young boys were being subjected to sexual
3 abuse.

4 158. Based upon “Johnny Defendants” knowledge it was reasonably and foreseeable that
5 the acts as alleged would occur.

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

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

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

16 162. As a direct, proximate, and legal cause of “Johnny Defendants” conduct, Plaintiff
17 has suffered injuries and damages including, but not limited to, severe emotional distress, and
18 psychological trauma.

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

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

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THIRD CAUSE OF ACTION

(Negligence Against “Mirage” Defendant)

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

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

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

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

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

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

15 171. Based upon “Mirage” knowledge it was reasonably and foreseeable that the acts as
16 alleged would occur.

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

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

23 174. “Mirage” knew, or in the exercise of reasonable care, should have known that the
24 sexual abuse of Plaintiff was egregious, constituting a danger to Plaintiff and other sexually abused
25

1 young boys, and “Mirage” failed to take reasonable precautions to prevent the sexual abuse as
2 alleged herein.

3 175. “Mirage” benefited financially by the “Johnny Defendants” gambling at their hotel
4 and by the “Johnny Defendants” promoting their casino considering their social status in Japan
5 along with their media presence.

6 176. As a direct, proximate, and legal cause of “Mirage’s” conduct, Plaintiff has suffered
7 injuries and damages including, but not limited to, severe emotional distress, and psychological
8 trauma.

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

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

13 **FOURTH CAUSE OF ACTION**

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

15 179. Plaintiff incorporates by reference each and every allegation previously made in
16 this Complaint as if fully set forth herein.

17 180. The actions Defendants as described herein constitute negligent infliction of
18 emotional distress, emotionally impacting Plaintiff and causing Plaintiff to suffer shock and
19 serious emotional distress as a direct and proximate result thereof.

20 181. As a direct, proximate, and legal cause of the Defendants conduct, Plaintiff has
21 suffered injuries and damages including, but not limited to, severe emotional distress, and
22 psychological trauma.

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

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

3 **FIFTH CAUSE OF ACTION**

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

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

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

9 186. As a direct, proximate, and legal cause of the Defendants conduct, Plaintiff has
10 suffered injuries and damages including, but not limited to, severe emotional distress, and
11 psychological trauma.

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

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

16 **SIXTH CAUSE OF ACTION**

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

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

20 190. Plaintiff is a victim of sexual abuse as defined by NRS 432B.100.

21 191. Through the acts and omissions described above, Defendants financially
22 benefited from a venture where they knew or should have known sexual abuse was taking place
23 against Plaintiff.

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1 192. 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.

4 193. 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.

6 194. 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.

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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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