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Electronically FILED by
Superior Court of California,
County of Los Angeles
1/06/2026 11:06 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By Y. Ayala, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

STACIE JOY ORRICO, an individual,	Case No. 26STCV00252
Plaintiff,	COMPLAINT FOR DAMAGES AND
vs.	DEMAND FOR JURY TRIAL
Britt Ham, an individual who worked for Britt Huston Entertainment LLC, as successor in interest or also known as, Rocketown Management, LLC; Universal Music Group, and its subsidiaries, as successor in interest to Electric and Music Industries and its subsidiaries. and DOES 5 through 30.	1. Negligence (Common Law; CACI No. 400) 2. Negligent Supervision and Failure to Warn (Common Law; CACI No. 426) 3. Negligent Failure to Warn, Train, or Educate (Common Law) 4. Sexual Battery (Cal. Civ. Code § 1708.5) 5. Gender Violence (Cal. Civ. Code § 52.4) 6. Childhood Sexual Abuse (Cal. Code Civ. Proc. §§ 340.1 and 340.11) 7. Intentional Infliction of Emotional Distress (Common Law; CACI No. 1600)
Defendants.	JURY TRIAL DEMANDED

COMES NOW Plaintiff STACIE JOY ORRICO (“Plaintiff”), by and through his undersigned counsel, and alleges upon information and belief as follows:

INTRODUCTION

Plaintiff Stacie Joy Orrico was an innocent and joyful child, full of dreams, one of which was to become a singer. That dream—and her childhood, adolescence, and entire life—were permanently threatened and profoundly altered by the trauma she endured as a result of sexual abuse and exploitation while she was a minor child and a professional musical artist under Defendants’ control, supervision, and authority.

The violations of Plaintiff’s rights reflect a broader and deeply troubling pattern of institutional failure, lack of prevention, and abuse of power by organizations that positioned themselves as Plaintiffs’ protectors. In this case, religious organizations and a corporate music enterprise exploited their authority over a vulnerable child and the trust of parents seeking to support their child’s development and aspirations. Protection and care—fundamental obligations owed to Plaintiff—were absent from Plaintiff’s relationship with Defendants.

After the Christian music industry “discovered” twelve-year-old Stacie Orrico, it exploited her and destroyed her innocence.



On tour bus age 14

This case follows a child who sang at a Christian music festival and, as a result, attracted the attention of Christian music executives and a predator Christian music agent employed by a Christian talent agency. Stacie’s Christian parents naively believed she was safe because everyone involved identified as Christian. They were completely mistaken.

1 Stacie sang songs of worship, lightness, hope, and joy. Yet her life no longer reflected a sheltered,
2 morally centered upbringing. Her Christian record label and Christian tour company demanded that
3 she abandon school and work 12-to-16-hour days. Worse, the Christian music industry failed to
4 implement safeguards to protect her from sexual abuse while she traveled specifically to California,
5 to promote their mutual interests. The Christian music industry disregarded signs of abuse and then
6 abandoned her when the abuse surfaced.

7 After years of therapy and personal struggle, and an attempt to reconcile her religious upbringing
8 and the hell she was put through at the hands of her abusers, Plaintiff now brings this action to seek
9 accountability for the abuse, exploitation, and profound harm she suffered. Although Plaintiff's
10 childhood cannot be restored and the trauma she endured cannot be erased Plaintiff seeks to hold
11 Defendants' responsible for the lasting physical, emotional, psychological, and spiritual injuries they
12 caused.

13 **THE PARTIES**

14 1. Plaintiff Stacie Joy Orrico is a competent adult who currently resides in the City of
15 Savannah, Chatham County, Georgia; during the material time frame Plaintiff was a minor child in
16 the State of California.

17 2. Defendant Britt Ham is a competent adult who resides in the City and County
18 of Dallas, Texas. During the material time frame he worked for Defendant Rocketown Management
19 LLC which transition to Defendant Britt Huston Entertainment LLC in about 2002. During the
20 material frames, Defendant Ham was in California.

21 3. Defendant Universal Music Group ("UMG") is a corporation organized and
22 existing under the laws of California, with its principal place of business at 2220 Colorado Avenue,
23 Santa Monica, California. Defendant UMG is a company that acquired Defendant Electric &
24 Musical Industries Limited (EMI), Defendant EMI Christian Music Group, Inc., Defendant
Forefront Communications Group, Inc., Defendant Virgin Records America, Defendant Capitol
Christian Music Group, and Defendant ForeFront Records.

4. Defendant UMG is liable for all acts, omissions, and liabilities of Defendant EMI,
Defendant EMI Christian Music Group, Inc., Defendant Forefront Communications Group, Inc.,
Defendant Virgin Records America, Defendant Capitol Christian Music Group, and Defendant
ForeFront Records, including those occurring prior to Defendant UMG's acquisition of Defendant
EMI, Defendant EMI Christian Music Group, Inc., Defendant Forefront Communications Group,

1 Inc., Defendant Virgin Records America, Defendant Capitol Christian Music Group, and Defendant
2 ForeFront Records under the doctrine of alter ego and/or successor liability and/or agency.

3 5. Defendants Does 5 through 30, inclusive, are individuals and/or business or corporate entities
4 incorporated in and/or doing business in California whose true names and capacities are unknown to
5 Plaintiff, who therefore sues such Defendants by such fictitious names, and who will amend the
6 Complaint to show the true names and capacities of each such Doe Defendant when ascertained.
7 Each such Defendant Doe is legally responsible in some manner for the events, happenings and/or
8 tortious and unlawful conduct that caused the injuries and damages alleged in this Complaint.

9 **A. Agency**

10 6. At all relevant times, each Defendant was the agent, servant and/or employee of other
11 Defendants.

12 7. Each Defendant was acting within the course and scope of their or its authority as an
13 agent, servant and/or employee of the other Defendants.

14 **B. Joint Venture**

15 8. Defendants combined their property, skill, knowledge, and efforts in furtherance of a common
16 business enterprise for profit —namely, the development, packaging, marketing, and promotion of
17 Plaintiff as one of their musical artists.

18 9. Defendants entered into an agreement, whether express or implied from their acts and
19 declarations, under which they shared a community of interest and a joint interest in this common
20 business undertaking, understood and agreed to share profits and losses, and exercised joint control
21 over the operations.

22 10. The Defendants are sued under joint venture theory of liability

23 **C. Apparent Agency.**

24 11. Defendants, through their conduct and omissions, led Plaintiff to reasonably believe that
Defendant Ham was acting as an agent of the Defendants and its executives.

12. From the very beginning of Plaintiff's career, label executives such as Eddie DeGarmo and
Greg Ham presented Defendant Ham as a trusted member of the Forefront family and broader
Christian music industry family.



Eddie DeGarmo (front right) at one of Plaintiff's Concerts in 2000

13. Defendants encouraged the Plaintiff and her family to place their trust in Forefront's guidance regarding management and career decisions, thereby inextricably intertwining the professional relationship with the values and identity of the Christian faith.

14. Plaintiff reasonably believed Defendant Ham's involvement to be sanctioned and supervised by the label, as he regularly participated in label meetings, family gatherings, prayers, and professional activities alongside Forefront staff.

15. Plaintiff relied on this apparent agency, entrusting Defendant Ham with her travel, lodging, and day-to-day management.

16. Defendants' actions led to Defendant Ham's unsupervised access to Plaintiff during tours and hotel stays—including in California—based on the belief that he was acting under the authority and oversight of the Defendants.

17. This reliance enabled Defendant Ham to exploit his position and facilitated the sexual abuse and exploitation alleged in this complaint.

JURISDICTION AND VENUE

18. This Court has subject matter jurisdiction over this action because it arises out of tortious conduct that occurred in the State of California, including in the County of Los Angeles. The amount in controversy exceeds \$25,000.

19. Venue is proper in the County of Los Angeles because acts and omissions giving rise to Plaintiff's claims occurred in this County, including Defendant Ham's sexual abuse of Plaintiff and

Defendants' related conduct, concealment, and failures to protect.

20. Plaintiff brings this action pursuant to California Code of Civil Procedure sections 340.1 and 340.11, as amended by Assembly Bill No. 218 and Senate Bill No. 577, which govern civil actions arising from childhood sexual assault.

21. The California Legislature enacted and amended these statutes in recognition that trauma resulting from childhood sexual assault often delays survivors from reporting abuse or pursuing civil remedies, and to ensure that survivors are not unfairly barred from seeking justice due to delayed discovery of injury.

22. The injuries and damages alleged in this Complaint result from acts of childhood sexual assault that would constitute criminal conduct under California Penal Code sections 288, 289, and 647.6.

23. For claims of childhood sexual assault occurring before January 1, 2024, an action may be commenced within the time limits set forth in California Code of Civil Procedure section 340.11(a)(1), including twenty-two years from the date Plaintiff attained the age of majority or five years from the date Plaintiff discovered or reasonably should have discovered that her psychological injury or illness was caused by the sexual assault, whichever period expires later.

24. California Code of Civil Procedure sections 340.1 and 340.11 apply to:

- (a) actions against a person who committed an act of childhood sexual assault;
- (b) actions against a person or entity that owed a duty of care to Plaintiff where a negligent or wrongful act was a legal cause of the assault; and
- (c) actions against a person or entity whose intentional conduct was a legal cause of the assault.

25. Certificates of compliance are not required under California Code of Civil Procedure sections 340.1 and 340.11 because Plaintiff was under forty years of age at the time this action was filed.

FACTUAL ALLEGATIONS

A. Plaintiff's Childhood, Discovery, and Entry into the Christian Music Industry

26. Plaintiff was born in 1986 to Christian parents and raised in a Christian household and community.

27. In 1998, when she was twelve, Plaintiff attended the "Praise in the Rockies" Christian music festival in Colorado. She was invited to join a group from her church that was participating in a high-staked talent competition at the event.

28. Among the judges were Defendant Ham and Eddie DeGarmo.

29. Defendant Ham is seen in this photo watching Plaintiff perform before the finals.



Defendant Ham watching Plaintiff

30. Plaintiff won the competition.



Plaintiff winning competition

31. Eddie DeGarmo introduced himself to Plaintiff and her father, expressed interest in signing Plaintiff, and requested their contact information in order to follow up.

32. Shortly after, Defendant Ham contacted Plaintiff's parents to discuss her musical future.

33. In the fall of 1998, Plaintiff was enrolled in school, taking classes in science, language arts, PE, drama, math, social studies, and the Bible.

1 34. Plaintiff and her parents met Eddie DeGarmo from Defendant ForeFront on September 9th
2 and 23rd, 1998, to discuss her musical future which would necessarily involve a formal agreement.

3 **B. Contracts, Career Control, and Defendants' Use of Plaintiff's Christian Identity**

4 35. Between February and May 1999, Plaintiff and her parents negotiated with Defendant EMI
5 Christian Music Group, Inc. and Defendant Forefront Communications Group, Inc. and their agents
6 Eddie DeGarmo and Greg Ham, and entered into an Exclusive Songwriter Agreement and a
Performance and Recording Services Agreement for Stacie to create music and record albums with
Defendant Forefront Communications Group, Inc.

7 36. The contract required her to travel, participate in photoshoots and interviews, and engage in
8 promotional activities for the label's benefit.

9 37. Defendant Ham, who worked for Defendant Rocketown Management LLC at this time,
10 became her manager during this period but was not a party to the contracts, but he knew Defendant
11 EMI Christian Music Group, Inc. and Defendant Forefront Communications Group, Inc. and their
agents Eddie DeGarmo and Greg Ham well, worked with them, and operated as an intermediary
between them and Plaintiff.

12 38. In about April 1999, when she was thirteen, Plaintiff along with her parents worked with and
13 signed agreements with Defendant EMI Christian Music Group, Inc. and Defendant Forefront
14 Communications Group, Inc.

15 39. From the beginning, the Defendants placed significant emphasis on Plaintiff's Christian faith
and it was always clear that she was being signed as a Christian child artist.

16 40. Defendants determined and advised Plaintiff that her Christian image was integral to their
17 management, packaging and promotion of her musical career.

18 41. Defendants intended for Plaintiff to appeal to Christian audiences.

19 42. Defendants own interests were further by their packaging of Plaintiff as a wholesome,
innocent child as compared to secular musical artists.

20 43. Defendants did not intervene when the agent Defendant Ham crossed boundaries with
21 Plaintiff and allegedly promoted her spiritual growth in Christianity, to the contrary the Defendants
considered such behavior to be admirable and in furtherance of their joint interests.

22 44. For example, Defendant Ham provided daily bible study reading assignments to Plaintiff,
23 then regularly reviewed those assignments with her in person or by phone.

24 45. Defendants did not establish checks and balances once Defendant Ham became both spiritual

1 and personal adviser to Plaintiff.

2 46. Defendant Forefront created her first album, writing and recording songs. Defendant EMI
3 Christian Music Group, Inc. and Defendant Forefront Communications Group, Inc.'s agent Eddie
4 DeGarmo received executive producer royalties as part of the agreement. Greg Ham was also
5 involved in executing the agreements.



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11 *Plaintiff ceremonial signing of contracts with Defendants*

12 **C. Promotion, Travel to California, and Sexual Abuse by Defendant Ham While Plaintiff**
13 **Was a Minor**

14 47. In August 2000, when she was fourteen, Defendant Forefront released Stacie's debut studio
15 album "Genuine."



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21 *Album Genuine*

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23 48. The Defendants marketed the album as Christian-based with tracks such as "Ride," "Don't
24 Look at Me," "0.0 Baby," "Without Love," "Stay True," "Genuine," "With a Little Faith," "My

1 Name (Interlude)," "So Pray," "Holdin' On," "Restore My Soul," "Confidant," "Everything," and
2 "Replay (Interlude)".

3 49. Plaintiff's album went gold.



11 *At Forefront records with her gold album*

12 50. To promote the album, Defendants required Stacie to travel to various locals including Los
13 Angeles, California.

14 51. On about October 9, 2000, while attending meetings in Los Angeles with representatives
15 from CAA and the Grammy Association, Plaintiff stayed at Shuttters on the Beach in Santa Monica,
16 accompanied by her mother and Defendant Ham.



21 *Plaintiff with her mom in California*

22 52. On several occasions Plaintiff's mom observed Defendant Ham and Plaintiff sitting closely
23 together in the hotel hallway, engaged in their daily prayer devotions.

24 53. During this trip, Defendant Ham met with the fourteen-year-old Plaintiff in his room.

1 54. Defendant Ham kissed her and instructed her to lie on his bed next to him.

2 55. Defendant Ham continued to kiss her and touched her over her clothes and between her legs.

3 56. Following these acts, Defendant Ham gave Plaintiff conflicting explanations. He would
4 instruct her that the acts were not a sin because he loved her. He would blame her then absolve her
5 for his inability to resist engaging in sex acts with her.

6 57. Plaintiff was confused, ashamed, but grew increasingly close to her abuser who impressed
7 the importance of secrecy and the need to act Christian and wholesome in public.

8 58. In about July 22–26, 2001, Plaintiff traveled to Los Angeles with Defendant Ham, for
9 rehearsals related to concerts promoting her album.

10 59. While there, Defendant Ham directed fifteen-year-old Stacie to come to his hotel room at the
11 Sofitel Hotel, where he sexually abused Plaintiff by kissing her, touching her genitals, and rubbing
12 his erect penis against her body until he ejaculated.

13 60. On or about August 24–27, 2001, Plaintiff traveled to Los Angeles for rehearsals,
14 accompanied by Defendant Ham.

15 61. They stayed at the Sofitel Hotel but in different rooms.

16 62. Defendant Ham instructed Plaintiff come to his room both for business and personal
17 reasons, including bible study.

18 63. Defendant Ham continued to be Plaintiff's spiritual adviser and mentor as part of his work as
19 a Christian music agent.

20 64. Defendant Ham would sit Plaintiff on the bed, kneel in front of her, place his hands on her
21 thighs and check in by asking how she was doing.

22 65. Defendant Ham sexually assaulted Plaintiff in his hotel room by digitally penetrating
23 Plaintiff's genitals and rubbing his erect penis against Plaintiff's body until he ejaculated.

24 66. That year, Defendant Forefront required Stacie to record a Christmas album titled "Christmas
Wish."



Plaintiff's Christmas Wish Album

67. The album peaked at No. 26 on the U.S. Top Holiday Albums chart and reached No. 28 on the US Christian Albums chart.



Plaintiff Performing During Christmas

D. Defendants' Knowledge, Notice, and Failure to Protect Plaintiff

68. Defendants were specifically on notice that the Christian music industry needed to take proactive steps to protect minor children from sexual assault from its own, specifically, Ja'Marc Antoine Davis who performed and published music with the Christian dance pop group Raze for Defendant ForeFront Records. Because in April 1998, he engaged in multiple sexual acts involving a minor, for which he was convicted in December 2001. *State of Oklahoma v. Ja'Marc Antoine Davis*, No. CF-2001-1279 (Okla. Dist. Ct. Tulsa Cnty. filed Mar. 1, 2001, closed Dec. 18, 2001)

69. Despite its knowledge that the label and branding of its Christianity could not in and of itself protect minor children in the industry, Defendants failed to take proactive steps to protect Plaintiff from harm by Defendant Ham sexual predator.

70. By the winter of 2001, Greg Ham witnessed Defendant Ham's improper behavior towards

1 Plaintiff on several occasions.

2 71. Greg Ham contacted Plaintiff's father and advised he witnessed Plaintiff and Defendant Ham
3 at a pool where there appeared to be too much touching going on such that it raised his concern that
4 the amount of physical contact was not healthy.

5 72. Years later, agent Greg Ham admitted to the Brentwood Police Department that he knew that
6 the then minor Plaintiff and Defendant Ham were in an inappropriate relationship. He stated that he
7 confronted all involved parties but that they all denied the relationship.

8 73. In 2002, Eddie DeGarmo told Plaintiff that he was aware of her inappropriate relationship
9 with Defendant Ham, told her that he had received similar reports from employees at Defendant
10 Forefront, blamed her for the relationship, and told her that it could jeopardize her career.

11 74. Defendants did not intervene to investigate or report Defendant Ham's sexual predatory
12 behavior with the minor Plaintiff to the authorities at any time.

13 75. Defendants left it up to the minor Plaintiff and her by now somewhat estranged parents to
14 figure out what to do.

15 76. Defendants' sole focus was the promotion and packaging of Plaintiff as a wholesome
16 Christian artist with pop cross-over potential, to foster the financial interests of Defendants.

17 **E. Continued Abuse, Retaliation, and Concealment to Protect Defendants' Financial**
18 **Interests**

19 77. Defendant Forefront Records and Defendant Virgin Records released Plaintiff's self-titled
20 second studio album on March 25, 2003, a few days after she turned 17.



23 *Plaintiff's Self-Titled Album*

1 78. The album, which blended Christian and pop music, achieved mainstream success and
2 produced international hits such as "Stuck" and "(There's Gotta Be) More to Life."



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8 *Plaintiff's Single "There's Gotta Be More to Life"*

9 79. On or about April 14-15, 2003, Plaintiff traveled to Los Angeles, California to promote her
10 second album staying at the Sofitel Hotel.

11 80. Defendant Ham summoned Plaintiff to his room.

12 81. Defendant Ham kissed her, rubbed her body and genitals, digitally penetrated her, then had
13 penetrative sex with her. when Plaintiff was seventeen years old.

14 82. Jeniffer Dake was Plaintiff's companion hired by her family in and around 2001.

15 83. Ms. Dake was terminated after she raised concerns to Defendants Forefront and Virgin that
16 Defendant Ham had developed an inappropriate, possibly harmful relationship with Plaintiff, and
17 that she needed a new manager after she observed Defendant Ham holding Plaintiff in his arms in
18 inappropriate manner.

19 84. It was very important for the Defendants to maintain Plaintiff's reputation as a Christian
20 artist by hiding the fact of her sexual abuse as a minor.



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24 *Plaintiff in December 2003*

F. Termination of the Relationship and Lasting Harm to Plaintiff

85. On March 3, 2004, Plaintiff turned 18 years old then terminated her relationship with Defendant Ham.

86. As a direct and proximate result of the Defendants' acts, Plaintiff suffered and has continued to suffer many harms including but not limited: anxiety; depression; stress; panic attacks; interpersonal relationship dysfunction; muscle cramping; sensitivity to noise; artistic and creative impairment; performance anxiety, and spiritual harm.



Plaintiff in Hospital

87. Due to the impact of Defendants' acts upon her, Plaintiff's music career came to abrupt end. Her career ended in or around 2007 when she left Defendant Forefront and Defendant Virgin Records.

G. Concerted Effort to Conceal Childhood Sexual Abuse

88. Defendants, acting individually and in concert, engaged in a deliberate effort to conceal Defendant Britt Ham's sexual abuse of Plaintiff while she was a minor child.

89. Defendant Ham isolated Plaintiff from peers, chaperones, and other trusted adults, exercised control over her movements, travel, and daily activities, and exploited his position of authority and spiritual influence to discourage disclosure and enforce secrecy.

90. Institutional Defendants knew or should have known of facts indicating inappropriate and abusive conduct and nevertheless failed to investigate, failed to report the abuse to law enforcement, silenced or removed individuals who raised concerns, and prioritized reputational and financial interests over Plaintiff's safety.

1 91. As a result of Defendants' concealment and concerted efforts to hide evidence of childhood
2 sexual abuse, Plaintiff was prevented from reasonably discovering, disclosing, or reporting the abuse
3 for many years.

4 92. Defendants' concealment constitutes a "cover-up" within the meaning of California Code of
5 Civil Procedure sections 340.1(c) and 340.11.

6 **FIRST CAUSE OF ACTION NEGLIGENCE**

7 **Negligence**

8 *(Common Law; CACI No. 400)*

9 *(Against All Defendants)*

10 93. Plaintiff incorporates by reference all prior paragraphs.

11 94. At all relevant times, Defendants had a duty to protect the minor Plaintiff when Plaintiff was
12 entrusted to their care. Plaintiff's care, welfare, and/or physical custody was temporarily entrusted to
13 Defendants, who voluntarily accepted this responsibility. As such, Defendants owed Plaintiff, a
14 minor child, a special duty of care in addition to the duty of ordinary care, and owed Plaintiff the
15 heightened duty of care that adults dealing with children must exercise to protect them from harm.

16 95. Defendants, by and through their agents, servants, and employees, knew or reasonably should
17 have known that Britt Ham was engaging in an inappropriate relationship with Plaintiff, in violation
18 of professional boundaries, and that such conduct posed a foreseeable risk of harm. Defendants,
19 including Eddie DeGarmo, had received feedback from Forefront employees regarding the
20 impropriety of Britt Ham's conduct. Eddie DeGarmo knew the relationship was inappropriate and,
21 despite such knowledge, failed to take appropriate action and instead blamed Plaintiff for the
22 inappropriate nature of the relationship. As a result, it was foreseeable that, absent adequate
23 supervision and protective measures, children entrusted to Defendants' care, including Plaintiff,
24 would be vulnerable to sexual abuse by Britt Ham.

96. Defendants breached their duty of care to the minor Plaintiff by allowing the Britt Ham to
come into contact with Plaintiff without supervision; by failing to supervise the Britt Ham, whom
they permitted and enabled to have access to Plaintiff; by failing to investigate or otherwise confirm
or deny facts about Britt Ham; by failing to inform or by concealing from Plaintiff, or law
enforcement officials that the Perpetrator was or may have been sexually abusing minors; by failing
to inform or by concealing from law enforcement officials that Plaintiff was or may have been

1 sexually abused after Defendants knew or had reason to know that Britt Ham may have sexually
2 abused Plaintiff, thereby enabling Plaintiff to continue to be endangered and sexually abused, and/or
3 creating circumstances where Plaintiff was less likely to receive medical or mental health care and
4 treatment, thus exacerbating the harm done to Plaintiff.

5 97. As a direct result of the above-described conduct, Plaintiff has suffered, and continues to
6 suffer, great pain of mind and body, shock, emotional distress, physical manifestations of emotional
7 distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; has
8 suffered and continues to suffer spiritually; was prevented and will continue to be prevented from
9 performing daily activities and obtaining the full enjoyment of life; has sustained and will continue
10 to sustain loss of earnings and earning capacity; and/or has incurred and will continue to incur
11 expenses for medical and psychological treatment, therapy, and counseling.

12 **SECOND CAUSE OF ACTION**

13 **Negligent Supervision and Failure to Warn**

14 *(Common Law; CACI No. 426)*

15 *(Against All Defendants)*

16 98. Plaintiff incorporates by reference all prior paragraphs as though fully set forth herein.

17 99. At all relevant times, defendants had a duty to provide reasonable supervision of Britt Ham;
18 to exercise reasonable care in investigating the Perpetrator; and providing adequate warning to
19 Plaintiff regarding Britt Ham's dangerous propensities and unfitness.

20 100. Defendants, by and through their agents, servants, and employees, knew or reasonably should
21 have known of Britt Ham's dangerous and exploitive propensities and/or that Britt Ham was an unfit
22 agent. Despite such knowledge, Defendants negligently failed to supervise Britt Ham in a position of
23 trust and authority, which enabled the commission of wrongful acts against Plaintiff. Defendants
24 failed to provide reasonable supervision and further failed to take reasonable measures to prevent
future sexual abuse.

101. As a direct result of the above-described conduct, Plaintiff has suffered, and continues to
suffer, great pain of mind and body, shock, emotional distress, physical manifestations of emotional
distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; has
suffered and continues to suffer spiritually; was prevented and will continue to be prevented from
performing daily activities and obtaining the full enjoyment of life; has sustained and will continue

1 to sustain loss of earnings and earning capacity; and/or has incurred and will continue to incur
2 expenses for medical and psychological treatment, therapy, and counseling.

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4 **THIRD CAUSE OF ACTION**

5 **Negligent Failure to Warn, Train, or Educate**

6 *(Common Law)*

7 *(Against All Defendants)*

8 102. Plaintiff incorporates by reference all paragraphs of this Complaint as though fully set forth
9 herein.

10 103. Defendants owed a duty to protect Plaintiff from the foreseeable risk of sexual assault by
11 their representatives and/or agents by implementing reasonable protective measures to warn, train, or
12 educate their employees, volunteers, representatives, agents, and/or Plaintiff about the known risk of
13 childhood sexual assault inherent in Defendants' business activities, which required Plaintiff to
14 travel and promote music as part of her contractual obligations, pursuant to *State of Oklahoma v.*
15 *Ja'Marc Antoine Davis*, No. CF-2001-1279 (Okla. Dist. Ct. Tulsa Cnty. filed Mar. 1, 2001, closed
16 Dec. 18, 2001).

17 104. Defendants breached their duty to take reasonable protective measures to safeguard Plaintiff
18 from the risk of childhood sexual abuse by Britt Ham. This breach included failing to warn, train, or
19 educate Plaintiff, Plaintiff's parents or guardians, and Defendants' employees, volunteers,
20 representatives, and/or agents about how to avoid, rebuff, minimize, or respond to such risks; failing
21 to warn, train, or educate these individuals about how to report inappropriate or suspicious behaviors
22 to law enforcement or other agents; and failing to promulgate or enforce.

23 **FOURTH CAUSE OF ACTION**

24 **Sexual Battery**

(Cal. Civ. Code § 1708.5)

(Against All Defendants)

105. Plaintiff incorporates by reference all prior paragraphs of this Complaint as though fully set
forth herein.

106. Beginning in the early 2000s, Defendant Britt Ham engaged in unlawful, harmful, and
offensive sexual contact with Plaintiff, including penetrative sexual intercourse, without Plaintiff's

1 consent. At all relevant times, Britt Ham was acting as an agent, representative, and/or affiliate of
2 Defendants, and his conduct occurred within the context of the authority, access, and trust conferred
upon him by Defendants.

3 107. Britt Ham's conduct constituted sexual battery in violation of California Civil Code section
4 1708.5. Defendants are liable for Britt Ham's sexual battery because, among other things, they
5 placed him in a position of trust and authority over Plaintiff, enabled his access to Plaintiff, and, after
6 learning of facts demonstrating the inappropriate nature of his conduct, failed to take reasonable
7 corrective action and instead ratified or approved his misconduct by covering up for him and
blaming Plaintiff.

8 108. As a result of the above-described conduct, Plaintiff has suffered, and continues to suffer,
9 great pain of mind and body, shock, emotional distress, physical manifestations of emotional
10 distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; has
11 suffered and continues to suffer spiritually; was prevented and will continue to be prevented from
12 performing daily activities and obtaining the full enjoyment of life; has sustained and will continue
to sustain loss of earnings and earning capacity; and/or has incurred and will continue to incur
expenses for medical and psychological treatment, therapy, and counseling.

13 **FIFTH CAUSE OF ACTION**

14 **Gender Violence**

15 (Cal. Civ. Code § 52.4)

16 (*Against Defendant Britt Ham Only*)

17 109. Plaintiff incorporates by reference all prior paragraphs of this Complaint as though fully set
forth herein.

18 110. Defendant Britt Ham committed acts of sexual assault and sexual abuse against Plaintiff that
19 constitute criminal conduct involving force, coercion, and abuse of authority, committed at least in
20 part because of Plaintiff's gender.

21 111. At all relevant times, Defendant Britt Ham exercised power, dominance, and coercive control
22 over Plaintiff as her manager, spiritual advisor, and a trusted adult placed in a position of authority
over her while she was a minor child.

23 112. Defendant Britt Ham's conduct constitutes gender violence within the meaning of California
24 Civil Code section 52.4.

1 113. Defendant Britt Ham acted intentionally, willfully, maliciously, and oppressively, with
2 conscious disregard for Plaintiff's rights, bodily integrity, and emotional well-being.

3 114. As a direct and proximate result of Defendant Britt Ham's gender violence, Plaintiff suffered
4 severe physical injury, psychological trauma, emotional distress, spiritual harm, and other damages as
alleged herein.

5 115. Plaintiff is entitled to compensatory damages, punitive damages, attorneys' fees, and costs
6 pursuant to California Civil Code section 52.4.

7 **SIXTH CAUSE OF ACTION**

8 **Childhood Sexual Abuse**

9 (Cal. Code Civ. Proc. § 340.1)

10 *(Against All Defendants)*

11 116. Plaintiff incorporates by reference all prior paragraphs of this Complaint as though fully set
forth herein.

12 117. Plaintiff was a minor child at all relevant times when Defendant Britt Ham committed
13 repeated acts of sexual abuse and sexual assault against her, including sexual touching, digital
penetration, and other sexually exploitative acts, as described herein.

14 118. Defendant Britt Ham's conduct constitutes childhood sexual abuse and sexual assault within
15 the meaning of California Code of Civil Procedure sections 340.1 and 340.11 and would constitute
criminal conduct under California Penal Code sections 288, 289, and 647.6.

16 119. At all relevant times, Plaintiff was entrusted to Defendants' care, custody, supervision, and
17 control as a minor child and professional musical artist required to travel, rehearse, perform, and
promote Defendants' commercial interests.

18 120. Defendants owed Plaintiff a duty to protect her from sexual abuse and exploitation while she
19 was a minor child under their authority, supervision, and control.

20 121. Defendants breached that duty by, among other things:

- 21 • Placing Defendant Britt Ham in a position of trust, authority, and control over Plaintiff;
- 22 • Allowing Defendant Britt Ham unsupervised access to Plaintiff during tours, travel, and hotel
stays;
- 23 • Failing to supervise, investigate, discipline, or remove Defendant Britt Ham after receiving
24 notice of inappropriate conduct;

- Failing to report suspected sexual abuse to law enforcement;
- Concealing the abuse and prioritizing Defendants' financial and reputational interests over Plaintiff's safety and well-being.

122. Defendants' negligent and intentional acts and omissions were a substantial factor in causing the childhood sexual abuse and sexual assault suffered by Plaintiff.

123. This action is timely pursuant to California Code of Civil Procedure sections 340.1 and 340.11. Plaintiff brings this action within the applicable limitation's periods, including twenty-two years from the date Plaintiff attained the age of majority and/or within five years from the date Plaintiff discovered or reasonably should have discovered that her psychological injury or illness was caused by the childhood sexual abuse, whichever period expires later.

124. California Code of Civil Procedure sections 340.1 and 340.11 expressly apply to actions brought against a person who committed an act of childhood sexual assault, as well as against persons or entities whose negligent or intentional conduct was a legal cause of the abuse.

125. As a direct and proximate result of Defendants' conduct, Plaintiff suffered severe and permanent physical injuries, psychological trauma, emotional distress, spiritual harm, loss of educational and career opportunities, loss of earning capacity, and other economic and non-economic damages in an amount according to proof.

126. Defendants' acts and omissions included a concerted effort to conceal evidence of childhood sexual abuse, including isolating Plaintiff, discouraging disclosure, silencing those who raised concerns, and prioritizing Defendants' reputational and financial interests, thereby entitling Plaintiff to enhanced damages, including treble damages, pursuant to California Code of Civil Procedure sections 340.1(c) and 340.11.

SEVENTH CAUSE OF ACTION

Intentional Infliction of Emotional Distress

(Common Law; CACI No. 1600)

(Against All Defendants)

127. Plaintiff incorporates by reference all paragraphs of this Complaint as if fully set forth herein.

128. Defendants engaged in extreme and outrageous conduct by knowingly placing and retaining Britt Ham in a position of trust and authority over Plaintiff, a minor, despite being aware that his relationship with Plaintiff was inappropriate, violated professional boundaries, and posed a

foreseeable risk of serious emotional harm.

129. Defendants further engaged in extreme and outrageous conduct by ratifying and approving Britt Ham's misconduct after learning facts demonstrating the impropriety of his conduct, including by covering up for him, shifting blame onto Plaintiff, and failing to take corrective or protective action.

130. Defendants' conduct in engaging in a concerted effort to hide evidence relating to childhood sexual assault was extreme and outrageous and was done intentionally or recklessly.

131. Defendants' conduct in retaining Britt Ham as its agent—whom they knew to be a threat to engage in childhood sexual assault with minors—and allowing Britt Ham to access Plaintiff who was contractually obligated to travel and perform and promote on Defendants' behalf as a musician while being subjected to abuse, was extreme and outrageous, and was done intentionally or recklessly.

132. Defendants were aware that childhood sexual assault by their agents was predictable and foreseeable risk of their enterprise. Despite knowing such risk, Defendants intentionally and recklessly failed to implement any policy to protect children in their care from that known risk.

133. Defendants' intentional, reckless, and outrageous conduct was directed at Plaintiff and/or committed with knowledge of Plaintiff's presence.

134. As a result of Defendants' conduct, Plaintiff experienced and continues to experience severe emotional distress resulting in bodily harm.

135. As a result of the above-described conduct, Plaintiff has suffered, and continues to suffer, great pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life; has suffered and continues to suffer spiritually; was prevented and will continue to be prevented from performing daily activities and obtaining the full enjoyment of life; has sustained and will continue to sustain loss of earnings and earning capacity; and/or has incurred and will continue to incur expenses for medical and psychological treatment, therapy, and counseling.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants, jointly and severally (unless otherwise indicated), as follows:

1. For general and noneconomic damage according to proof;

2. For special and economic damage, including medical and therapeutic expenses and past and future loss of earnings and earning capacity, according to proof;
3. For punitive damages as permitted by law;
4. For treble damages pursuant to California Code of Civil Procedure sections 340.1(c) and 340.11, based on Defendants' concerted efforts to conceal childhood sexual abuse;
5. For civil penalties as permitted by law, including under California Civil Code section 52.4;
6. For attorneys' fees as permitted by law;
7. For prejudgment interest as permitted by law;
8. For costs of suit incurred herein; and
9. For such other and further relief as the Court deems just and proper.

/s/ Mo Hamoudi

Mo Hamoudi, CA Bar No. 273104

Karen Koehler, WSBA #15325 (*Adm. Pro Hac Vice pending*)

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/s/ *Mo Hamoudi*

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DATED this 6th day of January, 2026.

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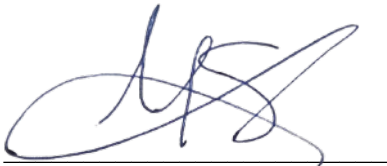
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CERTIFICATION

I hereby declare that on this day, I electronically filed the foregoing document with the Clerk of the Court using the eFile CA system and also via electronic mail (email) as follows:

Counsel for Defendants	<input type="checkbox"/> U.S. Mail
	<input type="checkbox"/> Fax
	<input checked="" type="checkbox"/> eFile CA
	<input checked="" type="checkbox"/> Electronic Delivery via email

DATED this 6th day of January, 2026.



Micha Star Liberty