

**IN THE SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA**

JEFFERY WILLIAMS,)	
)	
Plaintiff,)	
)	
v.)	Case No.:
)	
JLB PEACHTREE MANAGEMENT,)	
LLC, JLB PEACHTREE PARTNERS,)	
L.P., JLB PEACHTREE, LLC, and)	
PEGASUS RESIDENTIAL, LLC,)	JURY TRIAL
JOHN DOE, INC.,)	
)	
DEFENDANTS.)	

COMPLAINT

COMES NOW Jeffery Williams, Plaintiff, in the above styled matter and files his Complaint. Plaintiff respectfully shows as follows:

PARTIES AND JURISDICTION

1.

Plaintiff Jeffery Williams is a resident and citizen of the State of Georgia. Mr. Williams was a resident at the Trace Midtown apartments located at 782 Peachtree Street, NE, Atlanta, Georgia 30308 at all times relevant to the claims in this Complaint.

2.

Defendant JLB Peachtree Management, LLC is a for profit corporation organized under the laws of the State of Georgia. Defendant's principal office is located at 3890 West Northwest Highway, Seventh Floor, Dallas, Texas 75220. Defendant may be served with the summons and Complaint through its registered agent Corporation Service Company, 2 Sun Court, Suite 400, Peachtree Corners, Gwinnett County, Georgia 30092.

3.

Defendant JLB Peachtree Partners, LP is a for profit corporation organized under the laws of the State of Georgia. Defendant's principal office is located at 3890 West Northwest Highway, Seventh Floor, Dallas, Texas 75220. Defendant may be served with the summons and Complaint through its registered agent Corporation Service Company, 2 Sun Court, Suite 400, Peachtree Corners, Gwinnett County, Georgia 30092.

4.

Defendant JLB Peachtree, LLC is a for profit corporation organized under the laws of the State of Georgia. Defendant's principal office is located at 3890 West Northwest Highway, Seventh Floor, Dallas, Texas 75220. Defendant may be served with the summons and Complaint through its registered agent Corporation Service Company, 2 Sun Court, Suite 400, Peachtree Corners, Gwinnett County, Georgia 30092.

5.

Defendant Pegasus Residential, LLC is a for profit corporation organized under the laws of the State of Georgia. Defendant's principal office is located at 1750 Founders Parkway, Suite 180, Alpharetta, Georgia. Defendant may be served with the summons and Complaint through its registered agent Randy C. Gepp, 1600 Parkwood Circle, Suite 200, Atlanta, Cobb County, Georgia 30339.

6.

Defendant John Doe, Inc. upon information and belief provides contract concierge services to the Trace Midtown apartment complex and may be liable to Plaintiff for damages. Mr. Lamar Moham is the Director of Concierge Services at The Trace property and can be served a copy of this Complaint for notice purposes.

7.

This Court has jurisdiction over the Plaintiff and Defendants in this action. *See* Georgia Constitution, Art. VI, § I. Further, venue is proper in this Court as the registered agent for at least one Defendant resides in Gwinnett County. *See* Georgia Constitution, Art. VI, § II, Para. VI.

FACTS

8.

Plaintiff is an internationally known music artist who goes by the stage name Young Thug. Plaintiff is considered one of the most influential rappers of the 21st century.¹

9.

Plaintiff's music is both critically and commercially hugely popular. In 2020 alone, Plaintiff had fourteen (14) songs on the Billboard Hot 100.²

10.

Plaintiff, along with his girlfriend, leased an apartment at the property known as The Trace, located at 782 Peachtree Street, Atlanta, Georgia.

11.

Among the many amenities offered by The Trace, a 24-hour concierge service is provided to residents either through Defendant Pegasus Residential, LLC, the ownership Defendants or the John Doe, Inc. Defendant.

¹ Credit: BBC.com, Why Young Thug is the 21st Century's most influential rapper, October 21, 2019, Jeff Weiss.

² The Billboard Hot 100 is the music industry standard for tracking songs in the United States based on sales (physical and digital), radio play and online streaming.

12.

On November 1, 2020 Plaintiff returned to Georgia from Los Angeles, California and traveled home to The Trace apartments located at 782 Peachtree Street.

13.

Upon arrival at The Trace, Plaintiff entered the parking garage with his resident parking pass and parked on the third (3rd) floor. Plaintiff unloaded his belongings and then went to his apartment.

14.

Unbeknownst to Plaintiff, a leather Louis Vuitton bag was left beside his vehicle. A resident of The Trace reported the bag next to Plaintiff's vehicle to Lillie Bouie, an employee with The Trace's concierge service.

15.

At approximately 6:30 pm on November 1, 2020, Ms. Bouie retrieved the Louis Vuitton bag. Ms. Bouie knew the bag belonged to Plaintiff due to the brand of the bag and because it was immediately next to Plaintiff's black Lamborghini.

16.

Once Ms. Bouie retrieved the Louis Vuitton bag, she placed the bag in a secure/locked location at The Trace. Ms. Bouie contacted Plaintiff's residence at The Trace to inform him she had located and secured the bag and the concierge service would hold the bag until Plaintiff retrieved it.

17.

Ms. Bouie further placed a written note on Plaintiff's Louis Vuitton bag instructing other concierge employees not to release the bag to anyone without contacting her (Ms. Bouie) first so as to ensure it was returned to its rightful owner.

18.

Upon retrieval of Plaintiff's property, placement of Plaintiff's property in a secure location and the written directive to only return the property to Plaintiff – Defendants undertook a duty to safeguard and return Plaintiff's property.

19.

After Plaintiff's property was secured, and despite written direction to only release the property after speaking with Ms. Bouie, concierge employee Latoya Guest entered the secured area containing Plaintiff's property and released the property to an unknown person. Ms. Guest did not notify or otherwise speak to Ms. Bouie before releasing the property.

20.

It is unknown to whom Plaintiff's property was released and Plaintiff's property has not been returned to him. The Louis Vuitton bag had a present day value (as of the day it was given to an unknown individual) of approximately \$2,500. The contents of the bag included:

- A. \$40,000.00 in U.S. Currency;
- B. A diamond encrusted watch worth approximately \$57,000.00;
- C. A chain with inset diamonds worth approximately \$37,000.00; and,
- D. A hard drive containing approximately 200 unreleased songs by Plaintiff/Young Thug worth at least an estimated \$1,000,000.00.

21.

Defendants voluntarily took possession of Plaintiff's property, notified Plaintiff of their possession of his property, and undertook additional efforts to secure it and only return it to a proper party. When Defendants released the property to an unknown individual other than Plaintiff or Plaintiff's authorized representative, Defendants breached a duty of care to Plaintiff which had been created by their actions.

22.

Defendants failed to properly supervise their employees and/or agents or to have in place proper and adequate policies and procedures to protect Plaintiff and other residents of The Trace when Defendants took possession, custody and control of Plaintiff's property.

23.

As a direct and proximate cause of the Defendants' failure to properly supervise their employees, have proper procedures and policies in place, and Defendants' breach of their duty to Plaintiff after taking possession of his property, Plaintiff has suffered significant monetary damages.

COUNT I. NEGLIGENCE

ALL DEFENDANTS

24.

Plaintiff sets forth and reincorporates herein, each preceding paragraph and allegation.

25.

Defendants undertook a duty to safeguard Plaintiff's property when it was retrieved from the Defendants' parking garage by their employee and agent.

26.

Once Defendants had possession, custody and control of Plaintiff's property, Defendants undertook a duty to protect Plaintiff's property by placing it in a secure and locked room accessible only by Defendants and their employees and agents.

27.

Defendants further undertook a duty to protect Plaintiff's property when its employee and agent issued written instructions to inform a specific employee and agent of Defendants before releasing the property to ensure it was only released to Plaintiff or his authorized agent.

28.

Defendants breached these duties owed to Plaintiff by releasing Plaintiff's property to an unauthorized and unknown person.

29.

As a direct and proximate result of Defendants' negligence, Plaintiff has suffered economic damages in an amount to be proven at trial, but no less than:

- A. \$40,000.00 in U.S. Currency;
- B. A diamond encrusted watch worth approximately \$57,000.00;
- C. A chain with inset diamonds worth approximately \$37,000.00; and,
- D. A hard drive containing approximately 200 unreleased songs by Plaintiff/Young Thug worth at least an estimated \$1,000,000.00.

30.

Defendants have also been unreasonable and stubbornly litigious such that Plaintiff is entitled to his attorney's fees and costs of litigation.

COUNT II. NEGLIGENT SUPERVISION AND FAILURE TO TRAIN

ALL DEFENDANTS

31.

Plaintiff sets forth and reincorporates herein, each preceding paragraph and allegation.

32.

Defendants own, operate and/or manage The Trace – a self described luxury apartment community with sophisticated amenities including a tenant concierge service.

33.

As part of the provision of tenant concierge services, Defendants had the duty to train and supervise its concierge staff.

34.

However, the Defendants failed to adequately train concierge employees and/or to have sufficient policies, procedures and controls related to the handling of, keeping possession of and safely returning a tenant's valuable property.

35.

The Defendants' negligent supervision and failure to train concierge employees was the direct and proximate cause of Plaintiff's property being released to an unauthorized person. Due to Defendants' negligence, Plaintiff's property cannot be recovered or located and Plaintiff has damages as follows:

- A. \$40,000.00 in U.S. Currency;
- B. A diamond encrusted watch worth approximately \$57,000.00;
- C. A chain with inset diamonds worth approximately \$37,000.00; and,

D. A hard drive containing approximately 200 unreleased songs by Plaintiff/Young Thug worth at least an estimated \$1,000,000.00.

WHEREFORE, Plaintiff prays that he have a trial on all issues and judgment against Defendants as follows:

(a) That Plaintiff recovers the full present day value of his lost property in an amount to be proven at trial;

(b) That Plaintiff recover such other and further relief as is just and proper including attorney's fees and the costs of litigation;

(d) That all issues be tried before a jury.

This the 14th day of October 2021.

HAYLE HOFFECKER PEACOCK, LLC

/S/ CHARLES HOFFECKER

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